



Privacy Impact Assessment

for the

Quality Assurance Database (QADB)

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Abstract

The U.S. Department of Homeland Security (DHS), U.S. Citizenship and Immigration Services (USCIS) oversees lawful immigration to the United States. USCIS' mission is to preserve the integrity of the legal immigration system by efficiently and fairly adjudicating immigration requests. USCIS operates the Quality Assurance (QA) Program to evaluate the application of immigration laws, regulations, and policies of previously adjudicated immigration requests. USCIS operates a QA Program to systematically review immigration request decisions using information originally collected during the adjudication process to ensure the consistent processing of immigration requests and to inform USCIS leadership on relevant trends. USCIS is conducting this Privacy Impact Assessment (PIA) to discuss the Quality Assurance Database (QADB) used to support the QA Program and to assess the personally identifiable information (PII) used to perform quality assurance reviews.

Overview

USCIS oversees lawful immigration to the United States and is responsible for processing petitions, applications, and other immigration-related requests. USCIS functions include the intake, review, and adjudication of the following types of benefits:

- 1) Family-Based;¹
- 2) Employment-Based;²
- 3) Humanitarian-Based;³
- 4) Adoption-Based;⁴ and
- 5) Citizenship and Naturalization-Based.⁵

USCIS processes various types of immigration request forms that fall within the jurisdiction of the USCIS Field Operations Directorate, Service Center Operations (SCOPS) and Refugee Asylum International Operations Directorate (RAIO). A core component of USCIS' mission is to preserve

¹ An individual may petition for relatives (or future relatives such as a fiancé(e) or a prospective adopted child) to immigrate to the United States.

² All foreign workers must obtain permission to work legally in the United States. Each employment category for admission has different requirements, conditions, and authorized periods of stay. USCIS offers the following employment-based categories: temporary worker, permanent workers, students and exchange visitors, and temporary visitors for business.

³ USCIS provides a number of humanitarian programs and protection to assist individuals in need of shelter or aid from disasters, from oppression, for emergency medical issues, and for other urgent circumstances, including: asylum; refugee; parole; deferred action; temporary protective status; battered spouse, children, and parents; and victims of human trafficking and other crimes.

⁴ USCIS is responsible for determining the eligibility and suitability of the Prospective Adoptive Parents (individuals) looking to adopt and determining the eligibility of the child to immigrate to the United States.

⁵ Naturalization is the manner in which a person not born in the United States voluntarily becomes a U.S. citizen.



the integrity of the legal immigration system by efficiently and fairly adjudicating immigration requests.

Federal statutes, including the Immigration and Nationality Act of 1965,⁶ as amended, as well as Executive Orders⁷ and mandates from the Secretary of Homeland Security, direct DHS to coordinate an internal audit and compliance review program. USCIS operates a QA Program to enable a systematic review of all immigration request adjudications to ensure the integrity and quality of the immigration process. The purpose of the USCIS QA Program is to improve quality and consistency of USCIS operations. The QA Program continuously monitors and measures compliance with procedures in all adjudication processes to provide greater transparency in immigration enforcement and ensure consistency in operations.

Each USCIS Directorate has an integrated QA Program that is responsible for (1) reviewing and measuring the quality of its adjudicative decisions by generating consistent statistical measures on the extent of compliance with applicable laws, regulations, policies, procedures, and training materials; (2) ensuring the integrity and consistency of adjudications by identifying and addressing any areas of inconsistency within and between offices, and across form types; and (3) identifying training needs, areas for additional guidance, and processes that require improvements.

Each QA Program generally follows the following three steps:

- 1) Sampling,
- 2) Checklists, and
- 3) Statistical and Trend Analysis.

Some steps may use personally identifiable information (e.g., name, date of birth, case number) originally collected for adjudication and operational purposes. This involves creating checklists for each adjudication type, evaluating data for completeness, matching information across datasets, and converting data to statistical results. The steps, associated systems, and information used to support each step are described in detail below.

1) Sampling

Sampling is a statistically valid method of estimating the characteristic of a population. More simply stated, sampling is using a smaller group to represent the whole. Some benefits of sampling are to save time and money, allow for meaningful data, and improve accuracy and simplify measurement over time. Population is the number of occurrences or how often a service

⁶ See 8 U.S.C. § 1103.

⁷ See Executive Order 13767, available at <https://www.whitehouse.gov/presidential-actions/executive-order-border-security-immigration-enforcement-improvements/> and Executive Order 13678, available at <https://www.whitehouse.gov/presidential-actions/executive-order-enhancing-public-safety-interior-united-states/>.



is provided, or an item is produced in a period of time (e.g., the total number of I-130, *Petition for Alien Relative*, approvals completed at a Service Center in July).

The QA Program uses either the U.S. Army Audit Agency's Statistical Sampling method⁸ or the Office of Performance and Quality (OPQ) Sample Size Calculator⁹ in order to generate an appropriate sample size for QA review. Once the size of the population is determined (or estimated), the QA team can calculate several sampling options that can then be evaluated against the goal of the QA review and resource availability. Samplings may include names, Alien Numbers (A-Number), case numbers, dates of birth, and biographic information. The team also determines the appropriate parameters for the population. For each QA review, these parameters such as date range or adjudication type may be adjusted as appropriate to accommodate the underlying purpose and resource requirements of the review.

2) Checklists

Checklists are the most important part of the QA review process. USCIS has developed a series of standardized checklists to evaluate compliance with processes and procedures and completeness of the administrative actions. Checklists are a tool used during QA reviews to see whether cases comply with standards. Each checklist is derived from Standard Operating Procedures (SOP), including security check SOPs, any applicable laws and regulations, policies, and training materials associated for each immigration form type. QA Reviewers use checklists to assess whether cases comply with adjudicative and procedural standards. The checklists contain questions that are answered by QA Reviewers as they review a case. They may also hold meta-data such as the determination on a case, office/location of the adjudication, date of decision, citizenship of applicant, basis of claim, name of officer/supervisor, name of reviewers, date of review, etc. In addition, QA Reviewers evaluate the reasonableness of the decision outcome - that is, whether they would have made the same decision given the evidence provided.

QADB is a tool used to track and report on quality reviews conducted for adjudicative functions throughout USCIS. USCIS Field Operations Directorate, SCOPS and RAIO use QADB to create dynamic electronic checklists through a feature that allows the administrator to set up questions and criteria for a particular case type. In instances where no standard checklist exists for a particular case, QA personnel may create a form-specific checklist with specific actions to be measured (e.g., approval, denials, motions). Checklists are form-specific and address all criteria necessary to adjudicate the case type. Each checklist varies by Directorate and case type.

⁸ The U.S. Army Audit Agency's Statistical Sampling System suggests a sample size of 75 cases.

⁹ OPQ provides data and operational analyses to senior decision makers in order to promote an effective and efficient analyses of production data to develop the operational policies and provide financial guidance to enable the processing of these applications.



QADB also prepopulates data from Computer Linked Application Information Management System and Associated Systems (CLAIMS 3),¹⁰ USCIS Electronic Immigration System (USCIS ELIS),¹¹ Global (not an acronym),¹² and Case and Activity Management for International Operations (CAMINO),¹³ through its connection to Enterprise Citizenship and Immigration Services Centralized Operational Repository (eCISCOR),¹⁴ into each checklist. The following data elements about the immigrant's requestor is included within the checklist: full name, email, case type, case decision type, A-Number, receipt number, and decision date. QA Reviewers cross-reference information originally collected during the adjudication process to ensure the consistent processing of immigration benefits.

The QA Reviewer uses the same standard operating procedures as the original adjudicator. QA reviews may access and use data from the Alien File (A-File) and designated USCIS case management and other associated systems to verify that the appropriate actions, identity, and security checks were appropriately completed within the following systems:

- Computer Linked Application Information Management System and Associated Systems (CLAIMS 3)
- Interim Case Management Solution (ICMS)¹⁵
- Person Centric Query Service (PCQS)¹⁶
- Electronic Document Management System (EDMS)¹⁷
- Arrival and Departure Information System (ADIS)¹⁸
- Treasury Enforcement Communications System (TECS)¹⁹

¹⁰ See DHS/USCIS/PIA-016(a) Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems, available at <https://www.dhs.gov/uscis-pias-and-sorns>.

¹¹ See DHS/USCIS/PIA-056 USCIS Electronic Immigration System (USCIS ELIS), available at <https://www.dhs.gov/uscis-pias-and-sorns>.

¹² See DHS/USCIS/PIA-027(d) USCIS Asylum Division, available at <https://www.dhs.gov/uscis-pias-and-sorns>.

¹³ See DHS/USCIS/PIA-051 Case and Activity Management for International Operations (CAMINO), available at <https://www.dhs.gov/uscis-pias-and-sorns>.

¹⁴ See DHS/USCIS/PIA-023(b) Enterprise Citizenship and Immigration Services Centralized Operational Repository (eCISCOR), available at <https://www.dhs.gov/uscis-pias-and-sorns>.

¹⁵ See DHS/USCIS/PIA-016(a) Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems, available at <https://www.dhs.gov/uscis-pias-and-sorns>.

¹⁶ See DHS/USCIS/PIA-010 Person Centric Query Service (PCQS), available at <https://www.dhs.gov/uscis-pias-and-sorns>.

¹⁷ See DHS/USCIS/PIA-003(a) Integrated Digitization Document Management Program, available at <https://www.dhs.gov/uscis-pias-and-sorns>.

¹⁸ See DHS/CBP/PIA-024 Arrival and Departure Information System (ADIS) available at <https://www.dhs.gov/privacy-documents-us-customs-and-border-protection>.

¹⁹ See DHS/CBP/PIA-009(a) TECS System: CBP Primary and Secondary Processing (TECS), available at <https://www.dhs.gov/privacy-documents-us-customs-and-border-protection>.



- Central Index System 2 (CIS2)²⁰
- Fraud Detection and National Security Data System (FDNS-DS)²¹
- USCIS Electronic Immigration System (USCIS ELIS)
- Enterprise Correspondence Handling On-line (ECHO)²²
- Enterprise Citizenship and Immigration Services Centralized Operational Repository (eCISCOR)²³
- Case and Activity Management for International Operations (CAMINO)
- Investor File Adjudication Case Tracker (INFACT)²⁴
- Adoptions Case Management System (ACMS)²⁵
- Global (not an acronym)

Once the adjudication actions are completed, the QA Reviewers may complete the checklist in QADB and may submit the checklist for validation to the validating employee (QA validator). While these analyses provide a broader picture of adjudications across the agency, the QA Program processes are not used for operational purposes such as the vetting of an individual or in the individual adjudication of a benefit request. QA Program data is strictly used for statistical analysis and reporting purposes. The findings have no impact on the benefit adjudication and no case management system is updated.

3) Statistical and Trend Analysis

Once results of the review have been obtained, the QA team analyzes the findings to identify root causes for problems/errors. Statistics are concluded from the total number of justifiable errors in relation to the checklists. The QA Program analyzes the findings to identify and track trends that indicate potential best practices, as well as problems that require analysis to develop recommended solutions.

²⁰ See DHS/USCIS/PIA-009 Central Index System (CIS) and associated updates, *available at* <https://www.dhs.gov/uscis-pias-and-sorns>.

²¹ See DHS/USCIS/PIA-013(a) Fraud Detection and National Security Data System (FDNS-DS), *available at* <https://www.dhs.gov/uscis-pias-and-sorns>.

²² See DHS/USCIS/PIA-063 Benefit Decision and Output Processes, *available at* <https://www.dhs.gov/uscis-pias-and-sorns>.

²³ See DHS/USCIS/PIA-023(b) Enterprise Citizenship and Immigration Services (eCISCOR), *available at* <https://www.dhs.gov/uscis-pias-and-sorns>.

²⁴ Forthcoming DHS/USCIS Immigrant Investor PIA.

²⁵ See DHS/USCIS/PIA-007(b) Domestically Filed Intercountry Adoptions Applications and Petitions, *available at* <https://www.dhs.gov/uscis-pias-and-sorns>.



Section 1.0 Authorities and Other Requirements

1.1 What specific legal authorities and/or agreements permit and define the collection of information by the project in question?

The Immigration and Nationality Act (INA), 8 U.S.C. §§ 1101, 1103, 1201, and 1255, authorize the collection of the information processed as part of the QA Program. Furthermore, Presidential Executive Order 13767, “*Border Security and Immigration Enforcement Improvements*,” and Executive Order 13768, “*Enhancing Public Safety in the Interior of the United States*,” and the Memorandum for the Secretary of State, the Attorney General, the Secretary of Homeland Security (March 6, 2017) direct DHS to enhance immigration enforcement.

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

For purposes of conducting Quality Assurance efforts, information is not collected directly from the individual, but rather is pulled from other USCIS source systems. SORN coverage is dependent on the source system used to conduct quality assurance reviews. Information collected, used, maintained, and stored by the QA Program is covered generally by the following SORNs:

- Alien File, Index and National File Tracking System of Record, which covers information about individuals collected and maintained in A-File as applicant’s pass through the immigration process.²⁶
- Inter-Country Adoptions Security, which covers the collection and use of adoption applications, decisional data, and associated fees for adjudication.²⁷
- Benefits Information System, which covers the collection and use of immigrant and nonimmigrant benefit applications, decisional data, and associated fees for adjudication.²⁸
- Asylum Information and Pre-Screening System of Records, 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 American Relief Act, credible fear screening cases, and reasonable fear screening cases.²⁹

²⁶ See 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-notices-sorns>.

²⁷ See DHS/USCIS-005 Inter-Country Adoptions Security, 81 FR 8614, (November 8, 2016), available at <https://www.dhs.gov/system-records-notices-sorns>.

²⁸ See DHS/USCIS-007 Benefits Information System, 84 FR 54622 (October 10, 2019), available at <https://www.dhs.gov/system-records-notices-sorns>.

²⁹ See DHS/USCIS-010 Asylum Information and Pre-Screening System of Records, 80 FR 74781, (November 30,



- Refugee Case Processing and Security Screening Information System of Record Notice, which covers the processing of refugee information.³⁰
- Immigration Biometric and Background Check (IBBC) System of Records, which covers background checks.³¹

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

Yes. QADB is a minor application under Digital Innovation and Development Information Technology (DID-IT). USCIS completed the DID-IT security assessment and authorization documentation in April 30, 2014, and the system was subsequently enrolled in the USCIS Ongoing Authorization Program. Despite its enrollment in the USCIS Ongoing Authorization Program, DID-IT has not met all of its privacy compliance requirements. DID-IT is a major application that hosts many minor applications. USCIS is actively working to provide PIA and SORN coverage for all DID-IT minor applications. This PIA assists with meeting the privacy compliance requirements for DID-IT.

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

Yes. National Archives and Records Administration (NARA) approved the QADB retention schedule (DAA-0566-2019-0017) on April 15, 2019. Records (e.g., sampling, checklists) maintained in QADB and similar systems are to be deleted and destroyed five (5) years after the cut off at the end of the calendar year in which the petition/request for immigration benefits is completed.

1.5 If the information is covered by the Paperwork Reduction Act (PRA), provide the OMB Control number and the agency number for the collection. If there are multiple forms, include a list in an appendix.

The Paperwork Reduction Act (PRA) is not applicable to the QA Program since it does not collect information directly from the public.

2015), available at <https://www.dhs.gov/system-records-notices-sorns>.

³⁰ See DHS/USCIS-017, Refugee Case Processing and Security Screening Information System of Record Notice, 81 FR 72075 (October 19, 2016), available at <https://www.dhs.gov/system-records-notices-sorns>.

³¹ See 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>.



Section 2.0 Characterization of the Information

2.1 Identify the information the project collects, uses, disseminates, or maintains.

The QA Program performs its reviews using information originally collected during the adjudication process. The QA Program does not directly collect information from the immigration benefit requestors or facilitate new adjudicative actions. The following information may be captured in the Checklist:

- Applicant's full name
- Reviewer's name
- Reviewer's office
- Date of Birth
- Place of Birth
- Address
- Passport Number
- Travel Document Number
- Identification Card Number (may include United Nations High Commissioner for Refugees (UNHCR)³² or Social Security card)
- Email
- Case Type (i.e., petition type)
- Case Number
- Case Decision Type
- A-Number
- Receipt Number
- Decision Date
- Criminal History

³² Individuals registered by the United Nations High Commissioner for Refugees (UNHCR) receive an identity card to demonstrate their identity and refugee status according to UNCHR.



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

The QA Program uses information originally collected during the adjudication process to complete checklists used to conduct reviews. QA Reviewers may cross reference the A-File, designated case management systems, and other support systems to verify the adjudicative actions. These systems include: CLAIMS 3, TECS, CIS 2, ICMS, ADIS, CAMINO, and eCISCOR.

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

No.

2.4 Discuss how accuracy of the data is ensured.

The QA Program does not collect information directly from the individual. The QA Program performs its reviews using information originally collected during the adjudication process to conduct its assessments about whether immigration benefits are being processed in a consistent manner. Most of the information the QA Program accesses was collected by another system. The QA Program must rely on the original point of collection of the information to accurately enter the information. Subject matter experts, in consultation with senior level managers, create QA checklists that are designed to accomplish the goals articulated by Directorate leadership. Reviewers are instructed to accurately identify populations and draw statistically representative samples for a specific period. In addition, some Directorates have developed quality levels to verify or dispute errors.

2.5 Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: There is a risk inaccurate information collected during the original adjudication is used to complete the checklist.

Mitigation: The risk is partially mitigated. The USCIS QA Program does not collect information directly. As such, it relies on the benefit requestor, accredited representative, form preparer, sponsor, or interpreter to provide accurate information. QA Reviewers also access previously collected information from USCIS and DHS systems. During the QA reviews, individual case files are randomly selected and reviewed by a team of experienced adjudicators. QA Reviewers assess whether adjudicative standards derived from SOPs, including security check SOPs, any applicable laws and regulations, policies, and training materials associated for each immigration form type were appropriately applied. QA reviews use a checklist to assess and record the quality of each case, but not the quality and accuracy of the original collection of information.



There is no direct impact to individuals if the information is incorrect because the processing of the data will not influence the adjudication of specific cases. No benefit-related decisions are made about individuals based upon the QA Program's use of the data, so there is limited impact of erroneous data on the statistical summaries produced or impact to individuals.

Privacy Risk: There is a risk of over collection in the checklists.

Mitigation: The risk is mitigated. The USCIS QA Program uses standardized checklists to conduct reviews to evaluate compliance with processes and procedures and completeness of the administrative actions. Each checklist collects specific criteria for each immigration form type. QA Reviewers cross-reference information originally collected during the adjudication process to conduct their assessments about whether immigration benefits are being processed in a consistent manner. QA Reviewers do not perform new adjudication searches and checks as part of their processes. The results of these efforts are not used to re-adjudicate requested benefits.

Section 3.0 Uses of the Information

3.1 Describe how and why the project uses the information.

The USCIS QA Program is responsible for ensuring that the adjudications of immigration-related filings are consistent across all of USCIS. Quality assurance is an important process used to monitor and evaluate the adjudicative process and procedures. Consistent with QA guidance, designated QA Reviewers perform reviews of immigration-related requests using checklists. The QA Program designed checklists for each benefit filing type, and each filing type is evaluated based on certain questions and criteria. QA Reviewers use the information for internal quality assurance purposes only. QA reviews are not intended to re-adjudicate the merits of a case. The assessment results are used to generate reports to identify gaps in the adjudication process and identify remediation actions. For example, USCIS may identify the need to coach, mentor, or provide refresher training to employees in areas that require improvement.

3.2 Does the project use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly? If so, state how DHS plans to use such results.

No.

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

No.



3.4 Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: There is a risk that information could be used in a manner inconsistent with the purpose of collection.

Mitigation: The risk is mitigated. All information within the QA Program is collected to evaluate the adjudication process and conduct assessments about whether immigration benefits are being processed in a consistent manner. USCIS does not share QA Program data and QA personnel working on the evaluation are trained to use the information solely for the purpose specified during the collection. Additionally, automated information technology systems used in the QA Program employ auditing measures and technical safeguards to prevent misuse of data. In addition, these systems have internal audits separate from the domain security audits; therefore, a double layer of audit trails exists.

Privacy Risk: There is a risk of unauthorized access to QADB and the other quality assurance records.

Mitigation: The risk is mitigated. USCIS protects QADB and the other quality assurance systems from unauthorized access through administrative, physical, and technical safeguards that include restricting access to authorized personnel who have a valid need-to-know. Access to systems that support the QA Program is given to QA personnel for performing quality assurance reviews of immigration-related filings. USCIS also deploys user logs to ensure users are only accessing information related to their job functions.

Privacy Risk: There is a risk that QADB could be used to conduct improper checks or auditing on other USCIS systems.

Mitigation: The risk is mitigated. QADB is not configured to perform and complete checklists automatically. Checklists are available in QADB for reviewers to complete electronically and store in the system. QA reviews are performed manually by designated reviewers to ensure appropriate adjudication procedures are followed. QADB is not configured to conduct checks or auditing on those other systems; those systems will have their own mechanism to ensure proper use.



Section 4.0 Notice

4.1 How does the project provide individuals notice prior to the collection of information? If notice is not provided, explain why not.

The QA Program and associated systems do not collect any new information directly from individuals, but rather preform quality assurance reviews using information provided by the benefit requestor. USCIS provides notice of the use of previously collected information through the publication of this PIA and the associated SORNs. In addition, the instructions on each benefit request form contain a Privacy Notice and instruction that provide notice to individuals about the collection, USCIS' 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.

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

The QA Program does not collect any new information directly from the immigration benefit requestor. The submission of a benefit request is voluntary. Individuals who apply for USCIS benefits are presented with a Privacy Notice and sign a release authorization on the benefit request. The Privacy Notice details the authority to collect the information requested.

4.3 Privacy Impact Analysis: Related to Notice

Privacy Risk: There is a risk that an individual may not be aware that his or her information is stored in QADB.

Mitigation: This risk is partially mitigated. Although individuals may not have specific notice that their information is maintained in QADB, USCIS provides notice through Privacy Notices contained on all immigration benefit forms, this PIA, associated SORNs, the USCIS website, and through benefit-specific Frequently Asked Question sheets.

Section 5.0 Data Retention by the project

5.1 Explain how long and for what reason the information is retained.

NARA approved the QADB retention schedule (DAA-0566-2019-0017) on April 15, 2019. Records are to be deleted and destroyed five (5) years after the cut off at the end of the calendar year in which the petition/request for immigration benefits is adjudicated. This retention schedule



allows USCIS to access the data for only as long as necessary to resolve inconsistencies with the adjudication of immigration benefits and ensure the integrity of the immigration process.

5.2 Privacy Impact Analysis: Related to Retention

Although there is always an inherent risk with retaining data for any length of time, data retention periods for QADB are consistent with the concept of retaining data to evaluate the adjudication process. The QA Program managers will set an automated schedule (technical and administrative) for the purging of non-evaluated data and for the archiving of evaluated data, per the approved record schedule.

Section 6.0 Information Sharing

6.1 Is information shared outside of DHS as part of the normal agency operations? If so, identify the organization(s) and how the information is accessed and how it is to be used.

No. USCIS does not share information maintained in the QA Program outside of DHS as part of normal business processes of the agency.

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

Not applicable. USCIS does not share information from QADB outside of DHS.

6.3 Does the project place limitations on re-dissemination?

Not applicable. USCIS does not share information from QADB outside of DHS.

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

Not applicable. USCIS does not share information from QADB outside of DHS.



6.5 Privacy Impact Analysis: Related to Information Sharing

There is no privacy risk associated with information sharing since USCIS does not share information from QADB outside of DHS as part of its normal agency operations.

Section 7.0 Redress

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

Individuals may seek access to their USCIS records by filing a Privacy Act or Freedom of Information Act (FOIA) request. Only U.S. citizens and lawful permanent residents may file a Privacy Act request. Individuals not covered by the Privacy Act or Judicial Redress Act (JRA) may still 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. Individuals may submit their Privacy Act or FOIA request to the following address:

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

Some information requested may be exempt from disclosure under the Privacy Act or FOIA because information may contain law enforcement sensitive information, the release of which could possibly compromise ongoing criminal investigations. Further information about Privacy Act and FOIA requests for USCIS records is available at <http://www.uscis.gov>.

7.2 What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?

U.S. citizens and lawful permanent residents, as well as other persons with records covered by the JRA, are afforded the ability to correct information by filing a Privacy Act Amendment request under the Privacy Act. U.S. citizens, lawful permanent residents, and persons covered by the JRA should submit requests to contest or amend information contained in USCIS systems to the USCIS FOIA/PA Office. Individuals must state clearly and concisely in the redress request the information being contested, the reason for contesting it, the proposed amendment, and clearly mark the envelope "Privacy Act Amendment." This would only apply to amendment of USCIS-held information. Persons not covered by the Privacy Act 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 an amendment of inaccurate records with evidence.

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

USCIS notifies individuals of the procedures for correcting their information in this PIA, source system PIAs, Privacy Notices, and through the USCIS website.³³ Specifically, the SORNs set forth in Section 1.2 provide individuals with guidance regarding the procedures for correcting information. The Privacy Notices, including notice of an individual's right to correct information, are also contained on the instructions to immigration forms published by USCIS.

7.4 Privacy Impact Analysis: Related to Redress

Privacy Risk: There is a privacy risk that individuals will be unable to correct or amend information about them that is used by the QA Program.

Mitigation: This risk is not fully mitigated. There is not a process for individuals to amend erroneous information once it has been shared from source systems with the QA Program and reviewers cannot change records that have been stored for statistical purposes. This PIA provides notice to individuals whose information is used by the QA Program that redress procedures are outlined in the source system PIAs and SORNs. However, even though individuals may not be able to correct or amend their information used in the QA Program, there is no direct impact to those individuals if the information is incorrect because the processing of the data will not influence the adjudication of specific cases. No benefit-related decisions are made about individuals based upon QA Program's use of the data, so there is limited impact of erroneous data on an individual.

Section 8.0 Auditing and Accountability

8.1 How does the project ensure that the information is used in accordance with stated practices in this PIA?

USCIS ensures that the practices stated in this PIA are followed by leveraging employee training, policies, rules of behavior, and auditing and accountability. Some procedures include practices for quality checklists undergoing multiple levels of clearance to ensure compliance. Automated information technology systems used in the QA Program employ auditing measures

³³ For more information, see <https://www.uscis.gov/>.



and technical safeguards to prevent misuse of data. In addition, these systems have internal audits separate from the domain security audits; therefore, a double layer of audit trails exists.

QADB is maintained in the Amazon Web Services environment (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.³⁴ AWS is FedRAMP-approved and authorized to host PII.³⁵ FedRAMP is a U.S. government-wide program that delivers a standard approach to the security assessment, authorization, and continuous monitoring for cloud services.

USCIS employs technical and security controls to preserve the confidentiality, integrity, and availability of the data, which are validated 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. DHS security specifications also 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.

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

All USCIS employees and contractors are required to complete annual privacy and computer security awareness training to ensure their understanding of proper handling and securing of PII. Privacy training addresses appropriate privacy concerns, including Privacy Act obligations (e.g., SORNs, Privacy Act Statements/Notices). The Computer Security Awareness Training examines appropriate technical, physical, and administrative control measures to safeguard information. In addition, QA Reviewers attend quality assurance calibration sessions. The USCIS Office of Privacy maintains a record of certificates of training on all USCIS employees and contractors.

³⁴ <https://marketplace.fedramp.gov/#/product/aws-us-eastwest?status=Compliant&sort=productName>.

³⁵ Public clouds are owned and operated by third-party service providers whereas private clouds are those that are built exclusively for an individual enterprise.



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

Only a limited number of employees and contract staff with a valid need-to-know have access to the information collected and maintained to perform quality assurance measurements. USCIS users who need access to QADB are required to complete an access request form. USCIS limits access to QADB to only authorized USCIS employees and contractors with a valid need-to-know the data in the system as part of their job responsibilities. Access privileges are limited by establishing role-based user accounts to minimize access to information that the user does not need to perform essential job functions. The employee's current job functions determine his or her need-to-know. The employee's supervisor must validate that the employee needs access to the information. Moreover, USCIS limits users' access privileges by ensuring they have authorized logon credentials (i.e., DHS-issued user ID and password) and have an established role-based user account.

8.4 How does the project review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within DHS and outside?

USCIS has a formal review and approval process in place for new sharing agreements. Any new use of information and/or new access requests for the system must go through the USCIS change control process and must be approved by the proper authorities of this process, such as the DHS Headquarters (including Office of General Counsel, Civil Rights and Civil Liberties, Office of Intelligence and Analysis, and Privacy Office), USCIS Privacy Officer, Chief of Information Security Officer, Office of the Chief Counsel, and the respective Program Office.

8.5 Privacy Impact Analysis: Related to the Accountability and Integrity of the Information.

Privacy Risk: There is a risk data maintained by AWS for the purposes of cloud hosting may be vulnerable to breach.

Mitigation: This risk is mitigated. USCIS is responsible for all PII associated with the QADB system, whether on a USCIS infrastructure or on a vendor's infrastructure, and it therefore imposes strict requirements on vendors for safeguarding PII data. This includes adherence to the DHS 4300A Sensitive Systems Handbook, which provides implementation criteria for the rigorous requirements mandated by DHS's Information Security Program.³⁶

³⁶ See <https://www.dhs.gov/publication/dhs-4300a-sensitive-systems-handbook>.



Privacy Risk: There is a risk that QADB, a DID-IT minor application, does not meet the privacy compliance requirements since DID-IT privacy requirements are not met.

Mitigation: This risk is partially mitigated. USCIS, in coordination with DHS Privacy, is actively working to provide PIA and SORN coverage for all DID-IT minor applications. This PIA assists with meeting the privacy compliance requirements for DID-IT.

Responsible Officials

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Approval Signature

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

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