



Privacy Impact Assessment  
for the

# Customer Scheduling and Services

**DHS/USCIS/PIA-046**

**June 6, 2013**

**Contact Point**

**Donald K. Hawkins**

**Privacy Officer**

**U.S. Citizenship and Immigration Services**

**(202) 272-8000**

**Reviewing Official**

**Jonathan R. Cantor**

**Acting Chief Privacy Officer**

**Department of Homeland Security**

**(202) 343-1717**



## Abstract

The Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) allows customers to schedule appointments with a USCIS Immigration Service Officer (ISO) to discuss the specifics of their benefit application and petition through the [infopass.uscis.gov](http://infopass.uscis.gov) website and customer service kiosks. This PIA discusses the USCIS systems associated with scheduling and managing appointments and evaluates the privacy risks and mitigation strategies built into the systems. These systems include InfoPass and the Customer Management Information System (CMIS). USCIS is conducting this Privacy Impact Assessment (PIA) because these systems collect, use, and maintain personally identifiable information (PII).

## Overview

The Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) is responsible for the administration and adjudication of applications and petitions for all immigrant and non-immigrant benefits under the Immigration and Nationality Act, 8 U.S.C. §§ 1101, 1103, 1201, and 1255. While USCIS' core mission is to ensure the timely adjudication of benefits, a priority for USCIS is to streamline the processing of customer inquiries to improve the overall customer experience. USCIS enhanced and expanded various online customer-oriented services in an effort to promote transparency and accessibility to its operations.

USCIS receives and processes millions of benefit cases each year. Customers who apply for immigration-related benefits may have questions about immigration law, procedures, or specifics of their case that are best addressed by a trained Immigration Service Officer (ISO). Previously, these customers seeking assistance from USCIS had to wait in long lines for a first-come first-served in-person appointment. Generally, the number of customers seeking assistance exceeded the number of appointments available at their local field office. Many customers had to make an additional trip to the local field office due to the overwhelming demand of individuals seeking assistance and lack of available appointments.

USCIS Field Operations Directorate (FOD) developed an online appointment scheduling system known as InfoPass. With InfoPass, USCIS FOD allows customers to schedule their own appointments online to speak with an ISO at a local USCIS field office. InfoPass offers a convenient alternative to waiting in long lines at USCIS field offices and ensures customers receive same day service. InfoPass automates the process of scheduling an appointment with USCIS through the internet and allows USCIS to efficiently manage and streamline its appointment scheduling process.

InfoPass allows customers to schedule in-person appointments with USCIS field offices nationwide. USCIS provides customers the option to schedule an appointment through the [infopass.uscis.gov](http://infopass.uscis.gov) website or at an InfoPass customer service kiosk. InfoPass users include:

1. Individual applicants and petitioners, and representatives: These users do not need user



names or passwords to schedule or cancel an appointment. InfoPass only permits these individuals to schedule one appointment at a time.

2. Third Party Representatives (TPR): Individuals and entities, such as lawyers and Community Based Organizations (CBO); these users have registered user accounts with public permissions. USCIS no longer issues TPR accounts for business reasons. USCIS grandfathered in existing accounts and currently five accounts remain. TPRs were issued user names and passwords only when their request for an account was approved by USCIS. The registered user account allows TPRs to schedule multiple appointments. TPR are able to use InfoPass to schedule appointments for their clients as an individual user.

InfoPass provides an alternative to waiting in long lines for assistance and reserve an appointment slot at a convenient time and date for the customer.

### **Appointment Creation**

InfoPass allows customers to schedule and cancel their own appointments with USCIS. Customers access InfoPass at <http://infopass.uscis.gov/> or through an InfoPass kiosk at USCIS field offices to schedule appointments. Each field office provides either a kiosk or computer to accommodate individuals without access to the internet to book an appointment. USCIS continues to assist walk-in customers, but those with a scheduled appointment receive priority.

InfoPass guides customers through several steps, including: finding a field office, choosing an appointment date, entering personal information, and confirming the appointment. To begin the process, customers enter their zip code into InfoPass to locate the closest field office. InfoPass displays a range of dates and times of available appointments for the customer to choose for the specified location.

InfoPass collects the following personally identifiable information (PII) from the customer to complete the appointment process:

- Full Name;
- Date of Birth;
- Telephone Number;
- Email Address;
- Alien Number (A-Number);
- Receipt Number;
- Country of Residence; and
- Purpose of Visit.

The name, date of birth, zip code, and telephone number are required fields to schedule an appointment. InfoPass provides the customer with an opportunity to enter biographic and



appointment information, review its accuracy, and amend prior to confirming his or her appointment. After the customer confirms the appointment, InfoPass generates an electronic appointment confirmation notice. Customers are instructed to print out the notice and bring it along with a photo ID to their appointment.

The appointment confirmation notice serves as the official appointment notice for the customer and contains the name of the customer; appointment type; confirmation number (a system-generated serial tracking number assigned to the appointment); appointment date; appointment time; location; and personal identification number (PIN), which is a system-generated, random, five-digit code assigned to the appointment. As a security measure, the PIN is displayed only at the time the appointment is created and cannot be retrieved at any other time.

Customers can review and reprint a copy of their confirmation appointment notice from any computer that is connected to the internet by going to <http://infopass.uscis.gov> and clicking on the link to make an appointment. The customer then enters the same first name, last name, date of birth, and phone number used when the original appointment was made. After clicking the 'continue' button, a copy of the confirmation letter will be displayed. However the 5-digit PIN number will not be included on this copy. The 5-digit PIN is required only if the customer needs to cancel the appointment for any reason.

Customers can also cancel their appointments through InfoPass by selecting the 'cancel' option. Customers must first cancel an existing appointment before they can schedule an appointment for another date and time. To cancel an appointment, InfoPass prompts the customer to provide the system-generated confirmation number and PIN printed on the original appointment confirmation notice to identify the confirmed appointment. Without the PIN and/or confirmation number, the customer will not be able to cancel their appointment and will not be able to make another appointment until the scheduled appointment date and time has passed. The customer then follows step-by-step instructions to complete the appointment cancellation process.

## **Appointment Management**

Upon arrival at an office for an appointment, customers check-in to their appointments at the front counter of the USCIS field office. The customer presents the printed confirmation appointment notice and a photo identification document to the Reception Desk Officer operating the counter. The ISO either scans the barcode located on the confirmation appointment notice or manually enters the confirmation number from the appointment confirmation notice into InfoPass, which displays the information about the customer and appointment. If the appointment confirmation notice is not available, the clerk manually searches the day's appointments for a name and date of birth match. If there is not a match, the Reception Desk Officer treats the customer as a walk-in.

USCIS uses Customer Management Information System (CMIS) to issue all customers (both walk-ins and those with scheduled appointments) a queuing ticket while the customer is checking into his or her appointment. CMIS is a queuing system that prioritizes customers to ensure they receive service in a timely and efficient manner, and allows USCIS personnel to better track incoming customers chronologically. CMIS handles individual appointments,



reception registration, customer routing and monitoring aspects of customer flow through the field offices, and generates real-time alerts when monitored aspects exceed an acceptable threshold. Each issued ticket is sequentially numbered to organize the queue flow of incoming customers and is assigned by arrival time. To generate a queuing ticket, the following information is entered into CMIS: confirmation number, A-Number, appointment type, appointment time, zip code, and number in the party. A CMIS generated queuing ticket places the individual in a virtual line. The printed ticket includes the ticket number, the service category, and the time the ticket printed. Once issued a ticket, USCIS directs the customer to the waiting area to be called for assistance.

The Immigration Service Officer (ISO) also uses CMIS to identify the next customer in the queue. ISO uses the A-Number to index and retrieve notes recorded into CMIS during an applicant's prior visits, and to retrieve the individual's A-File and relevant case information prior to the appointment to better assist the customer with his or her specific inquiry. The ISO who completes the appointment makes appropriate notes within CMIS about the questions the customer asked and the responses, and closes the ticket number at the end of the appointment. This information is used to better assist customers during future visits. USCIS time stamps each interaction from the moment the customer reports to the reception desk until the visit ends; e.g., waiting time, time spent with the agent. The ISO records all services provided to the customer in the visit in CMIS. USCIS does not use notes related to customer questions and inquires to make adjudicative benefit decisions.

## **Reporting**

USCIS field offices use InfoPass and CMIS to manage and track the flow of incoming appointments. Authorized USCIS personnel are able to use InfoPass and CMIS to run a variety of customizable reports to monitor employee workload and office productivity in order to determine if resources are properly allocated. These reports can be run on a broad spectrum to measure productivity trends and average processing times. InfoPass and CMIS can also generate granular level reports to identify types, number, and status of appointments located in a particular office or assigned to a particular ISO.

## **Customer Satisfaction Assessments**

USCIS Customer Services and Public Engagement Directorate (CSPED) conducts customer satisfaction assessments through electronic surveys (e-surveys) and focus groups to collect data from customers about their experiences and the level of satisfaction with the services received on the InfoPass appointment scheduling system and USCIS local offices. InfoPass and CMIS are used to improve customer services and enhance operational efficiency. A customer satisfaction assessment is an important tool in evaluating the level of satisfaction of all customers when using the InfoPass appointment system and obtaining USCIS local office services. Results from these assessments are used by USCIS to change and modify different aspects about InfoPass and office services in order to improve customer satisfaction.



## *E-Surveys*

USCIS extracts appointment and customer-related information from InfoPass to contact customers about e-surveys. Information extracted from InfoPass includes email address, location of appointment, and date of appointment. USCIS only emails e-surveys to customers who provided an email address. USCIS provides notice to the customer that the agency may use his or her email address to send follow up invitations to participate in voluntary e-surveys through the InfoPass Privacy Act Statement<sup>1</sup>. The survey is made available via a web link in the e-mail invitation and only solicits opinion-based responses from customers about their experience with InfoPass, their appointment, and service provided by USCIS employees. The e-survey is not mandatory and is conducted anonymously. In the e-mail invitations to the survey, customers are provided a notice with the purpose of the survey, instructions on how to complete the survey, and how to opt-out of future surveys. Four days after the initial invitation, an email reminder is sent to those individuals who have not yet responded. This is the last email these customers receive regarding the e-survey.

## *Focus Groups*

USCIS also conducts customer focus groups at various professional focus group facilities. To recruit respondents for the focus groups, USCIS randomly selects e-mail addresses of InfoPass customers whose local office matches the geographic location where the focus group is to be conducted. USCIS provides notice to the customer that the agency may use his or her email address to send follow up invitations to participate in voluntary focus groups through the InfoPass Privacy Act statement.<sup>2</sup> The contractor uses the e-mail addresses to send email invitations to customers. In the e-mail invitations to the focus group, customers are provided a notice with the purpose of the focus group, instructions on how to register, and how to opt-out of future surveys. Customers who are interested in participating in the focus group sessions respond to the request either by email or by telephone. When scheduling focus group meetings, the contractor collects the customer's first name and phone number to confirm participation of the customer in the focus group meeting. After the customer confirms participation, USCIS contacts the participant prior to the focus group session by e-mail or telephone to confirm participation.

Individuals who opted to participate in a focus group session are advised that the information is used to determine customer perceptions regarding the services received by InfoPass and the USCIS office and responses are anonymous. Responses to focus group questions from individuals are collected and retained through transcription services. These transcription documents do not include customer names or any other identifying information. USCIS CSPE generates customer satisfaction reports from the response. The responses are anonymous and aggregated and will not be tied to specific individuals. Once the focus group has been conducted, the survey contractor deletes all email addresses and telephone numbers associated with this specific focus group within 120 days of contact.

---

<sup>1</sup> See Appendix A of this PIA to view the InfoPass Privacy Act Statement.

<sup>2</sup> See Appendix A of this PIA to view the InfoPass Privacy Act Statement.



## 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 authority to collect information is found within the Immigration and Nationality Act (INA), 8 U.S.C. §§ 1101, 1103, 1201, and 1255.

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

The customer information in InfoPass, CMIS, and for the customer satisfaction assessments is covered by the DHS/USCIS-007 Benefit Information System (BIS) System of Records Notice (SORN), 73 FR 56596, September 28, 2008.<sup>3</sup> The customer responses from the customer satisfaction assessments are anonymous and do not require SORN coverage because they are not linked to an individual and are not uniquely retrievable. The employee information in InfoPass and CMIS is covered by the DHS/ALL-004 - General Information Technology Access Account Records System (GITAARS), November 27, 2012, 77 FR 70792.<sup>4</sup>

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

InfoPass, including CMIS, was approved for operation on August 26, 2010, for a period of three years unless a significant change to the information system requires an earlier accreditation. The InfoPass Authority to Operate (ATO) is set to expire on August 26, 2013. The InfoPass Security Plan (SP) was completed on July 15, 2010.

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

NARA approved the CMIS Retention Schedule [N1-566-08-08]. This schedule covers both InfoPass and CMIS records.

### **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.**

InfoPass is subject to the PRA requirements. OMB approved this collection under OMB

<sup>3</sup> Available at <http://www.gpo.gov/fdsys/pkg/FR-2008-09-29/html/E8-22802.htm>.

<sup>4</sup> Available at <http://www.gpo.gov/fdsys/pkg/FR-2012-11-27/html/2012-28675.htm>.



Control Numbers 1615-0113. OMB also approved the collection of customer satisfaction data under OMB Control Number 1615-0121.

## **Section 2.0 Characterization of the Information**

The following questions are intended to define the scope of the information requested and/or collected, as well as reasons for its collection.

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

#### *Appointment Scheduling*

InfoPass collects the following customer information to create an appointment: full name, zip code, date of birth, telephone number, email address, A-Number, receipt number, country of residence, and purpose of visit. The name, date of birth, zip code, and telephone number are the only fields required to schedule an appointment.

InfoPass generates and maintains an appointment confirmation notice with appointment details. The appointment confirmation notice contains the customer's name, appointment type, confirmation number, confirmation code, appointment date, appointment time, location, and PIN. Customers use the system-generated confirmation number and PIN to cancel an appointment with InfoPass.

#### *Customer Queue Flow*

To generate a queuing ticket, the following information from InfoPass is entered into CMIS: confirmation number and/or A-Number, appointment type, appointment time, zip code, and number in the party. CMIS generates a ticket number for each customer that places the individual in a virtual line. The printed CMIS ticket includes the ticket number, the service request category, and the time the ticket was printed. The information associated with a ticket, such as the A-Number, is used to index records of past visits to USCIS Field Offices and used by the ISO to retrieve the case information for the customer.

#### *Employee Information*

InfoPass and CMIS collect USCIS employee user names and passwords to facilitate log-in access to the system and for auditing purposes. CMIS employee PII includes the name of the ISO assigned to the appointment.

#### *Customer Satisfaction Assessments*

USCIS collects and uses email addresses from InfoPass users to email an e-survey or invitation for participation in a USCIS-sponsored focus group session. Results from the assessments are not stored in InfoPass.



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

USCIS collects information directly from the individual and/or his or her representative to schedule an appointment with USCIS through InfoPass. Customers may access InfoPass via the [infopass.uscis.dhs.gov](http://infopass.uscis.dhs.gov) webpage or a kiosk located at a USCIS office. CMIS information is collected from individuals, automatically generated during appointment check-in, and recorded by USCIS personnel to document the services provided during a visit.

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

USCIS does not use commercial or publicly available data to schedule appointments and place incoming customers in queue.

## **2.4 Discuss how accuracy of the data is ensured.**

InfoPass collects information directly from the individual or his or her representative; therefore, USCIS is dependent upon the accuracy of the information provided by the customer. InfoPass does not support customer access and alteration of information in the system. If customers determine information on the appointment confirmation notice is inaccurate, they can cancel the appointment to remove inaccurate information and schedule an appointment with the correct information. InfoPass generates a new PIN and confirmation number when the customer schedules a new appointment.

USCIS instructs customers to present their printed confirmation appointment notice and a photo identification document at the time of the appointment. USCIS employees scan the barcode on the confirmation appointment notice or type the confirmation number into InfoPass, which displays the information about the customer and appointment. If the appointment confirmation notice is not available, the ISO manning the front counter manually searches the day's appointments for a name and date of birth match. If there is a match, the customer is issued a CMIS ticket and waits to be called. If there is not a match, the customer will be treated as a walk-in customer.

## **2.5 Privacy Impact Analysis: Related to Characterization of the Information**

**Privacy Risk**: There is a risk that USCIS will collect more information than is necessary.

**Mitigation**: InfoPass collects a limited amount of biographical information and other data from the customer to schedule an appointment. This includes contact information and information that will be used to verify the identity of the individual during the appointment.



USCIS also uses the contact information provided by the individual to schedule an InfoPass appointment to conduct customer satisfaction assessments. The e-survey is not mandatory and is conducted anonymously. USCIS provides notice to the individual through the InfoPass Privacy Act Statement. USCIS provides additional notice in the e-mail invitations to the survey, along with the purpose of the survey, instructions on how to complete the survey, and how to opt-out of future invitations. The customer satisfaction survey collects information pertaining to his or her experience and asks customers to describe how he or she felt about the InfoPass and field office services. The customer satisfaction survey does not collect PII from the individual. USCIS uses results from these assessments to change and modify aspects of InfoPass and office services in order to improve customer satisfaction.

**Privacy Risk:** There is a risk that USCIS will maintain inaccurate data.

**Mitigation:** InfoPass collects the information directly from the individual or his or her representative. Therefore, USCIS relies on the accuracy the information provided by the individual. USCIS instructs the customer to bring and present his or her printed confirmation appointment notice and a photo identification document. USCIS scans the bar code on the confirmation appointment notice or enters the confirmation number into InfoPass, which displays the information about the customer and appointment. If the appointment confirmation notice is not available, the clerk manually searches the day's appointments for a name and date of birth match. If there is a match, the customer receives a CMIS ticket and waits to be called. If there is not a match, the customer will be treated as a walk-in.

## **Section 3.0 Uses of the Information**

The following questions require a clear description of the project's use of information.

### **3.1 Describe how and why the project uses the information.**

USCIS uses the information collected by InfoPass and CMIS to schedule and effectively manage appointments made by the customer, queue customers, and conduct a customer satisfaction assessment through the coordination of an e-survey or focus group. Specific uses of the information are as follows:

- Name and date of birth are used to identify the individual when he or she arrives for the appointment;
- Zip code is used to locate the field office closest to the individual scheduling the appointment;
- A-Number and Receipt Number are used to verify the identity of the individual, retrieve associated case data, and update information if there are any discrepancies at the scheduled appointment;
- Email addresses are used to contact the customer for Customer Satisfaction Assessments;



- Email address and/or phone number is used to contact the applicant in the event of a scheduling issue involving the appointment time; Confirmation number and PIN are used by the customer to cancel an appointment. If an appointment is canceled, InfoPass deletes the appointment and individual information associated with the confirmation number and PIN; and
- Results from customer satisfaction assessments are used by USCIS to change and modify different aspects about InfoPass and office services in order to improve customer satisfaction.

### **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.**

InfoPass and CMIS do not use technology to conduct electronic searches, queries, or analyses.

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

Access to InfoPass and CMIS is limited to USCIS authorized personnel. There is no intra-departmental sharing of this information.

### **3.4 Privacy Impact Analysis: Related to the Uses of Information**

**Privacy Risk:** There is a risk that InfoPass will collect information in a manner inconsistent with USCIS' authority and mission.

**Mitigation:** USCIS maintains the delegated authority under INA to determine eligibility for benefits. Implied in this authority and further prescribed by regulation is the ability to process and adjudicate applications and petitions requesting those benefits, and to require a personal appointment during that process. The information collected by InfoPass is necessary to identify applicants or petitioners when they appear for their appointments. Applicants or their representatives enter the information requested to schedule their appointments. For those seeking information or assistance but who have no application pending, the system collects only that data required for positive identification upon arrival at a local office. This information collection is consistent with the USCIS goal of providing efficient service to the public. CMIS limits PII to only the A-Number of the applicant that USCIS uses to retrieve the applicant's case during his or her following visits.

**Privacy Risk:** There is a risk that negative feedback from customer satisfaction assessments could adversely impact the individual's benefit request.



**Mitigation:** Results from these assessments are used by USCIS to change and modify different aspects about InfoPass and field office services in order to improve customer satisfaction. The e-survey is not mandatory and is conducted anonymously. In the e-mail invitations to the survey, customers are provided a notice with the purpose of the survey, instructions on how to complete the survey, and how to opt-out of future invitations. The customer satisfaction survey collects information pertaining to customer experiences and describes how he/she felt about the InfoPass and field office services. USCIS does not collect PII from the individual during the customer satisfaction survey and does not link the responses back to the customer's other records.

## Section 4.0 Notice

The following questions seek information about the project's notice to the individual about the information collected, the right to consent to uses of said information, and the right to decline to provide information.

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

USCIS provides general notice to individuals through the publication of this PIA and DHS/USCIS-007 BIS SORN. Additionally, USCIS provides a Privacy Act Statement prior to the submission of any information, as required by Section (e)(3) of the Privacy Act. The Privacy Act Statement notifies the individual about the authority to collect the information requested, purposes, routine uses, and consequences of providing or declining to provide the information to USCIS.<sup>5</sup>

USCIS also contacts the individual by email to request participation in an e-survey or focus group and advises the individual that participation is voluntary. In the e-mail invitation, customers are provided a notice with the purpose of the customer satisfaction assessment, instructions on how to participate, and how to opt-out of future requests.

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

The Privacy Act Statement informs individuals that providing the information is voluntary. A customer can choose to decline to provide information; however, that will prevent the customer from scheduling an appointment through InfoPass. Once the customer provides the information, he or she does not have the ability to consent for specific uses. Providing information is giving implied consent for all uses specified in the SORN.

---

<sup>5</sup> Please see Appendix A to view the InfoPass Privacy Act Statement.



### **4.3 Privacy Impact Analysis: Related to Notice**

**Privacy Risk:** There is a risk that individuals are not aware of the collection and use of their PII.

**Mitigation:** InfoPass provides notice to individuals and their representatives seeking to schedule an appointment with a local USCIS field office. Prior to the collection of information, individuals are informed through the Privacy Act Statement that providing the information is voluntary. A customer can choose to decline to provide information; however, that will prevent the customer from scheduling an appointment through InfoPass. Additionally, InfoPass provides step-by-step instructions that briefly explain why USCIS collects the information and how the agency uses the information.

USCIS also uses email addresses collected from InfoPass to request voluntary participation in customer satisfaction assessments. In the e-mail invitation, customers are provided a notice with the purpose of the customer satisfaction assessment, instructions on how to participate, and how to opt-out of future requests. Individuals who choose to provide feedback are further advised that their responses are anonymous, but used to help USCIS make informed decisions on customer support needs, potential system issues, future design priorities, and other knowledge to better serve USCIS customers.

## **Section 5.0 Data Retention by the project**

The following questions are intended to outline how long the project retains the information after the initial collection.

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

InfoPass retains PII to identify individuals scheduling an appointment for 60 days after the date of the appointment, with the exception of the full name, phone number, and email address data used to contact the customer in order to conduct customer service assessments. Information used to conduct customer quality assessments is purged after 120 days. USCIS destroys CMIS data when no longer needed for agency business.

### **5.2 Privacy Impact Analysis: Related to Retention**

**Privacy Risk:** There is a risk that PII is retained longer than necessary to fulfill specified purposes.

**Mitigation:** The CMIS data retention periods identified in the approved NARA schedule are consistent with the concept of retaining data only for as long as necessary to support the agency's mission. The schedule complies with the requirements of the Federal Records Act and the stated purpose and mission of the systems.



InfoPass and CMIS records are not used to make benefits decisions. The information in InfoPass is purged on a weekly basis to ensure that PII is not retained beyond the 60-day retention schedule. The only exception currently permitted on the retention of any PII older than 60 days is for the data used to conduct the Customer Satisfaction Assessments. This data is deleted within 120 days of receipt. Details about appointments are retained for as long as a business use requires the data. The details include name of the ISO conducting the interview, the date, and the times the interview started and ended.

## **Section 6.0 Information Sharing**

The following questions are intended to describe the scope of the project information sharing external to the Department. External sharing encompasses sharing with other federal, state, and local government, and private sector entities.

### **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.**

USCIS does not share appointment records from InfoPass or queue information from CMIS with external entities in the normal course of business.

### **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 appointment records from InfoPass or queue information from CMIS with external entities in the normal course of business. USCIS will ensure any instances of sharing are fully consistent with the Routine Uses outlined in the DHS/USCIS-007 BIS SORN.

### **6.3 Does the project place limitations on re-dissemination?**

Not applicable. USCIS does not share appointment records from InfoPass or queue information from CMIS with external entities in the normal course of business. USCIS will ensure any instances of sharing are fully consistent with the DHS/USCIS-007 BIS SORN.

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

Not applicable. USCIS does not share appointment records from InfoPass or queue information from CMIS with external entities in the normal course of business. USCIS will ensure any instances of sharing are fully consistent with the DHS/USCIS-007 BIS SORN.

### **6.5 Privacy Impact Analysis: Related to Information Sharing**

**Privacy Risk**: There is a risk of unauthorized sharing of information.



**Mitigation:** USCIS does not share appointment records from InfoPass or queue information from CMIS with external agencies. Any updates related to information sharing with external entities will be reviewed prior to disclosure and ensure any instances of sharing are fully consistent with the DHS/USCIS-007 BIS SORN. USCIS has an approval process in place for new sharing agreements. Therefore, this risk associated with external sharing is not applicable.

## **Section 7.0 Redress**

The following questions seek information about processes in place for individuals to seek redress, which may include access to records about themselves, ensuring the accuracy of the information collected about them, and/or filing complaints.

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

InfoPass allows the customers and their representatives to access their scheduled appointments through the online interface. InfoPass allows the individual or his or her representative to cancel an appointment and then schedule another appointment using the correct information if inaccurate information was provided. USCIS deletes all PII within 60 days after a customer's scheduled appointment. Customers seeking access to their scheduled appointment information may access it any time prior to the date and time of their scheduled appointment.

An individual may gain access to his or her USCIS records by filing a Freedom of Information Act (FOIA) or Privacy Act request. Any individual seeking access to his or her USCIS record may submit the aforementioned requests to following address:

U.S. Citizenship and Immigration Services  
National Records Center  
FOIA/PA Office  
P.O. Box 648010  
Lee's Summit, MO 64064-8010

The process for requesting records can be found at 6 CFR § 5.21. The request should state clearly the information that is being requested. The procedures for making a request for access to one's records can also be found on the USCIS web site, located at [www.uscis.gov](http://www.uscis.gov).

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

InfoPass customers and their representatives have the ability to correct information by cancelling the scheduled appointment and then scheduling another appointment using the correct information. The customer must first cancel the appointment, and then reschedule the appointment with the correct information. Customer and appointment data is deleted from InfoPass when an appointment is cancelled.



Individuals will not have the ability to correct appointment information after the appointment date has passed, and all records are deleted 60 days after the scheduled appointment date in InfoPass and CMIS. The only exception currently permitted on the retention of any PII older than 60 days is for the data used to conduct the Customer Satisfaction Assessments. This data is deleted within 120 days of contact.

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

The procedures for individuals to correct their information are outlined in this PIA and SORN associated with this system. After the appointment is completed, InfoPass does not provide means to make change appointment and queuing data.

### **7.4 Privacy Impact Analysis: Related to Redress**

**Privacy Risk**: There is a risk that individuals will not have the ability to correct their record.

**Mitigation**: InfoPass allows the individual or his or her representative to cancel an appointment and then schedule another appointment using the correct information if inaccurate information was provided. The cancellation of an appointment deletes all biographic and appointment information including the system-generated data, such as the confirmation number. Additionally, individuals may request access to information about themselves under the FOIA and PA; however, all information is deleted 60 days after the scheduled appointment and is therefore not available for access and amendment after deletion.

Additionally, responses from customer satisfaction assessments are anonymous, aggregated, and not tied to specific individuals. Therefore, customer satisfaction assessments are not available for access and amendment after submission.

## **Section 8.0 Auditing and Accountability**

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

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

InfoPass has an audit trail capability that monitors user activities and generates alerts for unauthorized access attempts. The general audit log and the security log allows the Global Administrator to select event type such as access or logon and the data displayed includes timestamp, name, IP, transaction, and site. The autolock log displays the person's name, last login, autolock date with time, reinstate date with time, username, and site. This auditing influences users to use the system appropriately.

InfoPass limits the number of employees with access to PII to those who need the



information to perform their duties, and will utilize software to perform network level auditing of the application. With the exception of district, region, and global administrators, users are limited to access data for only their specific location. InfoPass deletes PII after 60 days unless the information is used for customer satisfaction assessments. PII used for customer satisfaction assessments is deleted within 120 days. USCIS and DHS trusted internet connection use a commercial off-the-shelf solution to protect InfoPass from USCIS and internet connections. This network level protection includes connection auditing, detection, and prevention of suspect or malicious connections in order to limit or protect malicious use of InfoPass. These products include firewalls, routers, and load balancer/application firewalls that forward system event messages to a central logging facility. The central logging facility has the ability to detect known probe or attack signatures.

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

All federal employees and contractors are required to complete annual privacy and security awareness training. The Culture of Privacy Awareness training addresses appropriate privacy concerns, including Privacy Act obligations (e.g., SORN, Privacy Act Statements). The Computer Security Awareness training examines appropriate technical, physical, personnel, and administrative controls to safeguard information.

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

InfoPass and CMIS employ role-based access controls so only employee users with a need-to-know have access to the information in the system. InfoPass and CMIS provide a warning banner at all access points to deter unauthorized use of information by external and internal users. The banner warns authorized and unauthorized users about the appropriate uses of the system, that the system may be monitored for improper use and illicit activity, and the penalties for non-compliance.

External users are customers and their representatives who seek to schedule an appointment with a USCIS field office. InfoPass is publically available to customers through [infopass.uscis.gov](http://infopass.uscis.gov) for the purpose of scheduling and cancelling an appointment. A customer may only schedule one appointment using his or her PII.

Internal access is limited to registered employee users. Registered users must be granted access and be issued a user name and password prior to gaining access to the system. Internal access to information is on a need-to-know basis. This need-to-know is determined by the users and their respective responsibilities. Moreover, access privileges, for both internal and external users, is limited by establishing role-based user accounts to minimize access to information that is not needed for appointment management. InfoPass has the capability of identifying and deactivating unused accounts.



## **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?**

InfoPass and CMIS do not have any information sharing agreements with an organization within or outside of DHS. However, USCIS has 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.

### **Responsible Officials**

Donald Hawkins  
Privacy Officer  
U.S. Citizenship and Immigration Services

### **Approval Signature**

Original signed and on file with the DHS Privacy Office.

---

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



## **Appendix A: InfoPass Privacy Act Statement**

**AUTHORITIES:** The Immigration and Nationality Act, as amended, 8 U.S.C. §§ 1101, 1103, 1201, and 1255 authorizes USCIS to collect the information to schedule an appointment.

**PURPOSE:** The primary purpose for providing the requested information is to schedule an appointment with a USCIS Field Office. USCIS may use your email address to ask you to complete a voluntary survey or participate in a voluntary focus group about your customer service experiences.

**DISCLOSURE:** The information you provide is voluntary. However, failure to provide the requested information may prevent you from successfully scheduling an appointment through INFOPASS. Participation in a survey or focus group is voluntary.

**ROUTINE USES:** The information will be used by and disclosed to DHS personnel and contractors who need the information. Additionally, DHS may share the information with other federal, state, local government agencies and authorized organizations in accordance with approved routine uses, as described in the associated published system of records notices DHS-USCIS-007 - Benefits Information System, which can be found at [www.dhs.gov/privacy](http://www.dhs.gov/privacy). The information may also be made available, as appropriate for law enforcement purposes when relevant to civil, criminal, or regulatory investigations or prosecutions.