



Privacy Impact Assessment
for the

Migrant Information Tracking System

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Abstract

The United States Citizenship and Immigration Services (USCIS) developed the Migrant Information Tracking System (MITS) to serve as a centralized repository for information relating to migrants interdicted at sea. MITS facilitates USCIS' ability to record and track information pertaining to a migrant's illicit maritime migration into the United States and respond to information requests regarding interdicted migrants from Members of Congress inquiring on behalf of a family member of the migrant. USCIS conducted this privacy impact assessment (PIA) because MITS collects, uses, and disseminates personally identifiable information (PII).

Overview

While neither U.S. nor international refugee law instruments apply to the interdiction and repatriation of migrants encountered on the high seas, the handling of migrants intercepted at sea has been guided by successive Executive Orders since 1981. Currently, Executive Order 12,807 (May 24, 1992) and Executive Order 13276 (Nov 19, 2002) instruct the United States Coast Guard (USCG) to interdict and repatriate undocumented migrants at sea, unless the Secretary of Homeland Security decides that a person who is a refugee will not be returned without that person's consent.

The United States has a long-standing policy of providing all interdicted migrants with a meaningful opportunity to seek protection from persecution or torture. It is U.S. practice to provide a credible fear screening for any interdicted migrant who expresses or indicates, verbally or physically, a fear of return to his or her country of origin.¹ Migrants interdicted at sea by the USCG are interviewed by USCIS to determine whether the migrant should be returned to their country of origin or resettled in a third country. The USCIS Refugee Affairs Division (RAD) is responsible for deploying specially-trained USCIS officers to conduct protection screening for migrants. During the protection screening interview, the USCIS Protection Screening Officer (PSO) collects biographic information from the migrant and records the information in an interview worksheet. Data elements include, but are not limited to the migrant's full name, date of birth, address, gender, marital status, race, and occupation. (See Appendix A and B for all data elements collected during the protection screening interview.)

USCIS PSOs ask each interdicted migrant they screen whether he/she is willing to sign a confidentiality waiver. The confidentiality waiver specifically authorizes USCIS to disclose the migrant's full name, date of birth, place of birth, disposition, and status to Members of Congress inquiring on behalf of a family member of the migrant.

When the PSO completes the interview worksheet, the worksheet and confidentiality waiver are either faxed or e-mailed to RAD Headquarters for supervisory review. Once reviewed, limited data from

¹ For more information regarding the adjudication of refugee benefit applications or credible fear determinations, please see the Refugees, Asylum, and Parole System (RAPS) and the Asylum Pre-Screening System (APSS) PIA available at http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_cis_rapsapss.pdf.



the documentation are then manually entered into MITS by data entry personnel. MITS does not store information obtained on the PSO worksheet related to the credible fear analysis. Hard copies of the interview worksheet and waiver are stored at RAD Headquarters for future reference by the U.S. Refugee Admissions Program (USRAP). For example, prior interdiction records may be reviewed if a migrant is encountered at a later date by USCIS as a refugee applicant or if they are interdicted again by the USCG. Access to PSO worksheets is limited to USCIS and USCG personnel. The PSO worksheet is comprised of two pages, the first page consists of biographic information and is provided to USCG personnel to assist in their operations, the second page contains credible fear analysis information is provided only to USCIS.

The authority to collect information in MITS is set forth in the Immigration and Nationality Act and in the implementing regulations found in volume 8 of the Code of Federal Regulations (CFR). The 8 CFR 208.6, covers confidentiality of asylum applicants who are in the United States. By policy, the confidentiality provisions for asylum seekers and asylees has been extended to refugee applicants and refugees as well as migrants interdicted at sea.

MITS serves as a centralized repository for information relating to migrants interdicted at sea. MITS allows USCIS to record and track limited information obtained through the PSO worksheet, pertaining to a migrant's illicit maritime migration to the United States. The purpose of MITS is to consolidate the migrant's interdiction history into a single data set, which improves the interdiction data quality and integrity. MITS also assists USCIS in responding to requests for information about the interdicted migrant transmitted through a Member of Congress regarding the status of a relative who may have been interdicted at sea.

Typical Transactions

USCIS personnel manually input information obtained from the PSO worksheets and confidentiality waiver into MITS. If the migrant's information matches an existing record, the record will appear and be available for modification. USCIS updates the record to include the recent interdiction data. If no record exists, then USCIS creates a new record for the interdicted migrant. The following data elements are entered to create a new record: migrant's full name (first, middle, and last), date of birth, date of interdiction, country of origin, city of origin, location, and status. MITS does not maintain all information collected in the interview worksheet during the protection screening interview. The full worksheet may be used to assist USCIS RAD with the adjudication of refugee benefit applications or credible fear determinations.

MITS is also used to assist USCIS in responding to congressional inquiries regarding the status of a constituent's relative who may have been interdicted at sea. The status of all migrants interdicted at sea is confidential. The primary purpose of this policy is to avoid exposing migrants and their relatives to continued additional harm. Nevertheless, concerned relatives may request the status of a relative who may have been interdicted at sea through their respective Member of Congress. USCIS provides migrants with a confidentiality waiver that, if signed, allows USCIS to disclose information regarding the migrant's interdiction status to members of Congress inquiring on behalf of a family member.



Upon receipt of a congressional inquiry, USCIS Office of Congressional Relations (OCR) personnel search for the migrant's record in MITS. If the record is located and the confidentiality waiver has been executed, USCIS provides a response via email or paper detailing the migrant's current status (e.g., migrant subject in USCG custody, located at Guantanamo Bay Naval Station (GTMO), returned to country of origin). The response typically includes limited information such as the migrant's name, status, and disposition. The response memo is then transmitted back via email to the appropriate congressional office.

Section 1.0 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 as part of the program, system, rule, or technology being developed.

1.1 What information is collected, used, disseminated, or maintained in the system?

USCIS collects data provided by migrants who were interdicted at sea during the protection screening interview process. That data obtained from the migrant is recorded on the interview worksheet by the USCIS PSO. During the interview, the PSO collects the following biographic data elements: the migrant's full name, date and country of birth, addresses, gender, marital status, citizenship information, nationality information, religion information, occupation(s), education level, arrest history, and interdiction history. The full PSO Worksheet is used to assist USCIS with the adjudication of credible fear determinations or refugee benefit applications, which is outside the scope of MITS.

USCIS data entry personnel only input some information from the scanned or faxed interview worksheet into MITS which is used to track the interdiction history of each migrant and respond to congressional inquiries. Headquarters RAD maintains the interview worksheet in a temporary case file and destroys the original interview worksheet after 30 days. The following biographic information is inputted into MITS:

Names: USCIS collects the full name (first, last, and middle) of the migrant, spouse and dependent(s) of the migrant, and PSO.

Birth Date: USCIS collects the migrant's date of birth.

Citizenship/Nationality Information: USCIS collects the migrant's country and city of origin.

Gender: USCIS collects the migrant's gender.



Information Regarding Interdiction: USCIS records the migrant's interdiction date, interview date, and disposition (e.g., migrant subject in USCG custody, located in GTMO, returned to country of origin).

Confidentiality Release: USCIS records whether the confidentiality release was signed by the migrant.

1.2 What are the sources of the information in the system?

The PSO records his or her full name on the interview worksheet and the remaining information in MITS is gathered directly from the migrant during the protection screening interview. This information is recorded in the interview worksheet by the PSO.

1.3 Why is the information being collected, used, disseminated, or maintained?

USCIS collects this information to track the interdiction history of migrants intercepted at sea. In addition, the information is used to respond to congressional inquiries regarding the status of a constituent's relative who may have been interdicted at sea.

1.4 How is the information collected?

The data maintained in MITS is initially collected from the migrant during the first stage of a protection screening interview. The PSO records the information obtained during the interview in the interview worksheet. The confidentiality release is collected by either the USCIS PSO or USCG employee. Scanned or faxed copies of the worksheets and waiver are sent to RAD for supervisory review and then manually entered into MITS by data entry personnel. These worksheets are maintained by Headquarters RAD in a temporary case file and are used to assist USCIS RAD with subsequent credible fear determinations or the adjudication of refugee benefit applications.

1.5 How will the information be checked for accuracy?

All MITS data is checked for accuracy through a manual review process and technical controls. The scanned or faxed interview worksheets are sent to RAD Headquarters for supervisory review. Then, the worksheets are passed to data entry personnel for manual data entry into MITS. The data fields in the input screen are configured to limit the possibility of entering malformed data (e.g., the system rejects 00/00/00 birthdates). Data entry personnel are provided with the opportunity to review and edit information prior to and after their submission.

1.6 What specific legal authorities, arrangements, and/or agreements defined the collection of information?

The authority to collect information in MITS is set forth in the Immigration and Nationality Act and in the implementing regulations found in volume 8 of the CFR. The CFR, 8 CFR 208.6, covers confidentiality of asylum applicants who are in the United States. In practice, the confidentiality



provisions for asylum seekers and asylees has been extended to refugee applicants and refugees.

1.7 Privacy Impact Analysis: Given the amount and type of data collected, discuss the privacy risks identified and how they were mitigated.

Privacy Risk: Inaccurate information attributed to the individual.

Mitigation: The information maintained in MITS is collected directly from the individual during the protection screening interview. Therefore, USCIS is dependent on the accuracy and quality of information provided by the migrant. USCIS has a number of practices in place to check the accuracy of information. Completed, scanned or faxed interview worksheets are sent to RAD Headquarters for supervisory review. Then, the worksheets are manually entered into MITS. The data fields in the input screen are configured to ensure consistency of data (e.g., the system rejects 00/00/00 birthdates). Data entry personnel are provided with the opportunity to review and edit information prior to and after their submission. Additionally, authorized USCIS personnel have the ability to correct and edit inaccuracies, at any stage of the process, brought to their attention internally.

Section 2.0 Uses of the Information

The following questions are intended to delineate clearly the use of information and the accuracy of the data being used.

2.1 Describe all the uses of information.

The information maintained in MITS is used to assist USCIS in tracking intercepted migrants. USCIS creates and maintains a record in MITS for each interdicted migrant with the data elements discussed in Section 1.1. The information is also used to respond to congressional inquiries on behalf of constituents who are seeking the status of a relative who may have been interdicted at sea. USCIS searches and identifies the migrant in question by first and last name in MITS. If a record is located, USCIS responds to the Congressional member in writing with the name, date of birth, country and city of origin, current disposition, and status of the migrant.

2.2 What types of tools are used to analyze data and what type of data may be produced?

USCIS does not use MITS data to perform complex analytical tasks resulting in data matching, relational analysis, scoring, reporting, or pattern analysis. The system does not make available new or previously unavailable data from newly derived information.



2.3 If the system uses commercial or publicly available data please explain why and how it is used.

MITS does not use commercial or publicly available data.

2.4 Privacy Impact Analysis: Describe any types of controls that may be in place to ensure that information is handled in accordance with the above described uses.

Privacy Risk: Inappropriate use of the data.

Mitigation: User access to MITS is limited to those who need the information to perform their job functions. The system administrator is responsible for granting the appropriate level of access. All USCIS employees receive training on the proper use of information in accordance with DHS policies, procedures, regulations, and guidance.

Privacy Risk: Unauthorized access to data.

Mitigation: All records are protected from unauthorized access through appropriate administrative, physical, and technical safeguards that include restricting access to authorized users who have a need to know, designating user roles, and utilizing data encryption. USCIS displays a warning banner on the login screen to warn authorized and unauthorized users about proper and improper use of the data, that the system may be monitored to detect improper use, and the consequences of illicit use of the data. USCIS also employs user logs to ensure users are only accessing information related to their job functions.

Section 3.0 Retention

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

3.1 How long is information retained?

USCIS will delete or destroy the original USCIS PSO interview worksheets 30 days after the initial interview. Photocopies maintained by Headquarters RAD are kept in a case file for two years and then destroyed. The master file is the collection of records pertaining to migrants maintained in an information system that USCIS will delete or destroy 20 years after the record is created.

3.2 Has the retention schedule been approved by the component records officer and the National Archives and Records Administration (NARA)?

NARA approved the MITS retention schedule [N1-566-09-2] on October 1, 2008.



3.3 Privacy Impact Analysis: Please discuss the risks associated with the length of time data is retained and how those risks are mitigated.

Privacy Risk: Retaining information longer than necessary may exceed the limitations provided by the Privacy Act data minimization requirements.

Mitigation: USCIS worked with the USCIS Records Officer and NARA to develop the record schedule. USCIS and NARA carefully negotiated the schedule to ensure that the data is retained for the minimum time needed to track the migrants' interdiction history and respond to incoming Congressional inquiries. The MITS data retention periods are consistent with the concept of retaining data only for as long as necessary to support the agency's mission.

Section 4.0 Internal Sharing and Disclosure

The following questions are intended to define the scope of sharing within the Department of Homeland Security.

4.1 With which internal organization(s) is the information shared, what information is shared and for what purpose?

The information collected during initial protection screening is shared within RAD and with USCG. USCIS RAD forwards copies of the full interview worksheets to USCIS adjudicators processing applications before theUSRAP to assist in assessing a refugee claim, i.e., USCIS adjudicators at the USINT in Havana, Cuba. USCIS also shares the first page of the PSO interview worksheet which contains biographic information with USCG to facilitate the repatriation of migrants back to their homeland. USCG uses the biographic information from the worksheets to prepare proper documentation for the repatriation of a migrant to their country of origin. This information includes the migrant's name, date of birth, and address. However, the USCG repatriation process is outside the scope of MITS.

Access to MITS is only available to authorized USCIS personnel. USCIS RAD and OCR personnel have direct access to MITS.

4.2 How is the information transmitted or disclosed?

The interview worksheet and confidentiality release are either securely faxed or e-mailed to the USCIS adjudicators and USCG.

USCIS RAD and OCR personnel have direct access to MITS via the secured DHS networks.



4.3 Privacy Impact Analysis: Considering the extent of internal information sharing, discuss the privacy risks associated with the sharing and how they were mitigated.

Privacy Risk: The main risk associated with internal information sharing is unauthorized access to, or disclosure of, information contained within MITS.

Mitigation: DHS policies and procedures are in place to limit the use of and access to all data in MITS to the purposes for which it was collected. All authorized users must authenticate using a user ID and password. An audit trail is kept for system access and all transactions that request, create, update, or delete information from the system. The audit trail/log, which includes the date, time, and user for each transaction, is secured from unauthorized modification, access, or destruction.

Section 5.0 External Sharing and Disclosure

The following questions are intended to define the content, scope, and authority for information sharing external to DHS which includes Federal, state and local government, and the private sector.

5.1 With which external organization(s) is the information shared, what information is shared, and for what purpose?

USCIS uses the information in MITS to respond to congressional inquiries regarding the status of a constituent's relative who may have been interdicted at sea. Limited MITS data may be shared with Members of Congress and their staff if a confidentiality waiver was signed by the migrant. By signing the waiver, the migrant authorizes USCIS to release his/her name, date of birth, country and city of origin, disposition, and status.

5.2 Is the sharing of personally identifiable information outside the Department compatible with the original collection? If so, is it covered by an appropriate routine use in a SORN? If so, please describe. If not, please describe under what legal mechanism the program or system is allowed to share the personally identifiable information outside of DHS.

USCIS discloses information about the migrant's current status with Members of Congress and their staff only if a confidentiality release was signed by the migrant. All sharing is compatible with the purpose for which the information was originally requested. The information sharing is covered by the confidentiality release that, if signed, allows USCIS to disclose general information regarding the migrant's status to Members of Congress inquiring on behalf of a relative. It should be noted that migrants interdicted at sea are not legal permanent residents, visitors, nor are they applying for or receiving an immigration benefit. Therefore, a SORN is not required.



5.3 How is the information shared outside the Department and what security measures safeguard its transmission?

USCIS OCR personnel provide a response to congressional offices through encrypted electronic transmission or paper (i.e., e-mail or mail). Handling of information shared with Members of Congress is governed by the obligations set forth by 8 CFR 208.6. USCIS employs many security standards for handling and safeguarding PII during external sharing such as, only releasing the information required by the recipient and removing sensitive information when possible; providing user-specific training to USCIS OCR personnel to recognize sensitive information and know how to handle it; equipping personnel with standard operating procedures; limiting personnel authorized to share data; and using secure networks, encryption or secure delivery methods to protect information during transfer.

5.4 Privacy Impact Analysis: Given the external sharing, explain the privacy risks identified and describe how they were mitigated.

Privacy Risk: Unauthorized disclosure.

Mitigation: To mitigate risks of unauthorized disclosure of migrant information, notice is provided to the migrant during the protection screening process. Migrants interdicted at sea are provided a confidentiality release form that, if signed, allows USCIS to disclose information to Members of Congress inquiring on behalf of relatives. USCIS notifies the individual that information will not be disclosed unless the migrant authorizes such disclosures and the release is signed.

In addition, USCIS developed guidelines and security practices to mitigate the risk of unauthorized disclosure. The Refugee Division personnel must follow strict protocols outlined in user manuals, which describe appropriate data sharing procedures. If the migrant signed a confidentiality waiver, then limited information is transmitted via paper and encrypted electronic transmission (i.e., e-mail or mail). In the event of unauthorized disclosure to Members of Congress, all federal government employees (including contractors) are subject to federal information handling guidelines and ethics code.

Section 6.0 Notice

The following questions are directed at notice to the individual of the scope of information collected, the right to consent to uses of said information, and the right to decline to provide information.

6.1 Was notice provided to the individual prior to collection of information?

Yes. The USCIS PSO informs interdicted migrants that their biographical information and information related to their claim is collected to determine their disposition prior to the start of the interview. In addition, USCIS provides the migrant with a confidentiality release that, if signed, allows USCIS to disclose general information regarding the migrant's status to Members of Congress inquiring



on behalf of a relative.

Notice is also available to individuals prior to the collection of information through the publication of this PIA. It should be noted that individuals are not provided notice through publication of a SORN because migrants interdicted at sea are not legal permanent residents, visitors, nor are they applying for or receiving an immigration benefit and therefore in accordance with 5 USC § 552a as amended, a SORN is not required for this collection of information.

6.2 Do individuals have the opportunity and/or right to decline to provide information?

Yes. Interdicted migrants who are referred to a USCIS Pre-Screening Officer for a credible fear screening determination are instructed that the information they provide during the protection screening interview is a voluntary act on the part of the individual. Migrants can decline to sign the release or to participate in a credible fear screening; however, if the individual wishes USCIS to consider his or her credible fear claim, the information requested must be provided.

USCIS also provides migrants with a confidentiality release that, if signed, allows USCIS to disclose general information regarding the migrant's status to members of Congress inquiring on behalf of a relative. By signing the release, the migrant is voluntarily authorizing USCIS to disclose their information to members of Congress inquiring on behalf of a relative. Migrants are not required to sign the release in order to have their credible fear claim considered.

6.3 Do individuals have the right to consent to particular uses of the information? If so, how does the individual exercise the right?

Migrants are made aware that the information they are providing is being collected to assist in assessing why they have a credible fear. The individual has a right to decline to the uses of information; however, failure to provide the requested information may prevent USCIS from making a credible fear determination.

Additionally, the migrant must sign a confidentiality release in order for his/her information to be disclosed to a member of Congress inquiring on behalf of a relative. If the migrant declines to sign the release form, USCIS is not authorized to share the migrant's information. Therefore, the migrant has the right to consent to particular uses of the information.

6.4 Privacy Impact Analysis: Describe how notice is provided to individuals, and how the risks associated with individuals being unaware of the collection are mitigated.

Privacy Risk: Individuals may be unaware that their information is collected by USCIS.



Mitigation: Individuals interdicted at sea are made aware that the information they are providing during the protection screening interview is being collected by USCIS to track their interdiction history. USCIS also provides migrants with a confidentiality waiver that, if signed, allows USCIS to disclose general information regarding the migrant's status to members of Congress inquiring on behalf of a relative. By providing written consent, the migrant is aware that USCIS may disclose information pertaining to his or her interdiction status to third parties.

Section 7.0 Access, Redress and Correction

The following questions are directed at an individual's ability to ensure the accuracy of the information collected about them.

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

The system of records maintained in MITS is not subject to the Privacy Act; therefore, a SORN and the access and redress opportunities afforded by the Privacy Act are not required to be provided by USCIS. Migrants may request access to their information under the Freedom of Information Act (FOIA), and not the Privacy Act. FOIA generally provides individuals with the right to request access to any records maintained by a federal agency. Individuals seeking access to information maintained by USCIS should direct his or her request to USCIS FOIA Officer at:

National Records Center, FOIA/PA Office
P. O. Box 648010
Lee's Summit, MO 64064-8010

7.2 What are the procedures for correcting inaccurate or erroneous information?

As explained in Section 7.1, individuals whose records are stored in MITS are not provided the opportunity to contest or amend information.

7.3 How are individuals notified of the procedures for correcting their information?

As stated in Section 7.1, information maintained in this system of records is not covered by the Privacy Act to include the right to seek redress.

7.4 If no formal redress is provided, what alternatives are available to the individual?

As stated in Section 7.1, information maintained in this system of records is not covered by the



Privacy Act. Individuals can follow the procedures in Section 7.1. to gain access to their information under FOIA.

7.5 Privacy Impact Analysis: Please discuss the privacy risks associated with the redress available to individuals and how those risks are mitigated.

Privacy Risk: Individuals are not provided the opportunity to contest or amend inaccurate information.

Mitigation: Migrants whose information is maintained in MITS are not afforded redress mechanisms subject by the Privacy Act. To mitigate the risks associated with the maintenance of inaccurate data, USCIS does not use the data in MITS for decision making purposes pertaining to immigration benefits. USCIS provides notice, at the point of collection, to each migrant regarding its collection, use, and maintenance of their PII. USCIS must obtain explicit content from the migrant by signing a confidentiality waiver in order to share interdiction data with a Member of Congress on behalf of a relative.

Section 8.0 Technical Access and Security

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

8.1 What procedures are in place to determine which users may access the system and are they documented?

In compliance with federal law and regulations, MITS users (federal employees and contractors) will have access to the data on a need to know basis. This need to know is determined by the individual's current job functions. A user desiring access must complete USCIS G-8720, which states the justification for the level of access being requested. Access to the MITS database must be validated by the USCIS Refugee Affairs Division.

8.2 Will Access privileges are limited by establishing role-based user accounts to minimize access to information that is not needed to perform essential job functions Department contractors have access to the system?

Contractors may have access to MITS in order to perform their assigned roles. Access is provided to contractors only as needed to perform their duties as required in the agreement between USCIS and the contractor. In addition to the requirements outlined in Section 8.1, all contractors must sign a non-disclosure agreement, which outlines the limits and restrictions regarding use of the data, prior to accessing the systems or viewing records maintained in the system.



8.3 Describe what privacy training is provided to users either generally or specifically relevant to the program or system?

USCIS provides annual mandatory privacy training to all personnel. The privacy training addresses appropriate privacy concerns, including Privacy Act obligations (e.g., SORNs, Privacy Act Statements, etc.). Additionally, security training is provided on an annual basis to all USCIS personnel.

8.4 Has Certification & Accreditation been completed for the system or systems supporting the program?

MITS is covered under the California Service Center (CSC) Certification and Accreditation. The Authority to Operate (ATO) for CSC, which includes MITS, was issued on June 8, 2008 and is valid for a three year period (expires June 3, 2011).

8.5 What auditing measures and technical safeguards are in place to prevent misuse of data?

In accordance with DHS security guidelines, MITS employs auditing measures and technical safeguards to prevent the misuse of data. System users have legitimate job responsibilities that require them to design, develop, and optimize the system. This work is performed under supervisory oversight. MITS uses audit capabilities that log user activity. All user actions are tracked via audit logs to identify information by user identification, date, time and data accessed. Furthermore, each employee completes annual mandatory security awareness and privacy training that addresses their duties and responsibilities to protect the data.

8.6 Privacy Impact Analysis: Given the sensitivity and scope of the information collected, as well as any information sharing conducted on the system, what privacy risks were identified and how do the security controls mitigate them?

Privacy Risk: Unauthorized use of information contained within MITS.

Mitigation: Access and security controls have been established to identify and mitigate privacy risks associated with authorized and unauthorized users, namely misuse and inappropriate dissemination of data. Role-based user accounts are used to limit access to the system to the minimum necessary. Audit logs are used to track user activity. All personnel are required to complete annual online computer security training.



Section 9.0 Technology

The following questions are directed at critically analyzing the selection process for any technologies utilized by the system, including system hardware, RFID, biometrics and other technology.

9.1 What type of project is the program or system?

MITS is a database system.

9.2 What stage of development is the system in and what project development lifecycle was used?

MITS is in the operations and maintenance (O&M) phase of the DHS Development System Life Cycle.

9.3 Does the project employ technology which may raise privacy concerns? If so please discuss their implementation.

MITS does not employ any technology that may raise privacy concerns. MITS is used to track information pertaining to the migrant's maritime migration and respond to congressional inquiries.



Responsible Officials

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Approval Signature Page

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