



Privacy Impact Assessment
for the

myUSCIS

DHS/USCIS/PIA-064

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Abstract

The U.S. Citizenship and Immigration Services (USCIS) launched myUSCIS, an online platform that provides customers additional digital services to interact with USCIS. The purpose of myUSCIS is to offer online customers a wider range of USCIS services. USCIS is implementing myUSCIS features in a phased approach. This initial Privacy Impact Assessment (PIA) and the attached appendices discuss and evaluate the privacy risks and mitigations associated with the collection, use, and maintenance of personally identifiable information (PII) in myUSCIS and its digital services. USCIS will update the appendices of the PIA as subsequent digital services and functionalities are added to myUSCIS.

Overview

U.S. Citizenship and Immigration Services (USCIS) is the component of the Department of Homeland Security (DHS) that oversees lawful immigration to the United States. Enshrined in USCIS' mission is the commitment to provide accurate and useful information to its customers. myUSCIS provides customers with search tools and online process management tools to promote awareness and understanding of the citizenship process. myUSCIS provides a suite of digital services tightly integrated from an online customer's perspective to create a seamless end-to-end online experience.

myUSCIS is a public-facing web application that allows individuals to obtain accurate information about the general U.S. immigration process. myUSCIS is a service that helps online customers navigate through the immigration process. On myUSCIS, customers are able to find up-to-date information about the application process for immigration benefits, tools to help prepare for naturalization, and resources to find citizenship preparation classes and doctors in their local community. See the Appendices for a complete overview of the operational services, list of collected data elements, and uses of the information. All digital services are also mobile-accessible.

At the bottom of the customer interface for some of the digital services, myUSCIS offers a voluntary electronic survey to collect opinion-based feedback from online customers about their overall experiences and satisfaction with the digital service and its content. The online user is able to identify whether the information was helpful.

myUSCIS also serves as an information portal available to members of the public with a search function and other resources for use when filing immigration benefits. When fully operational, myUSCIS will become the customer service digital interface for USCIS.



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 limited case-specific information that is collected and shared with online customers is covered under the Benefit Information System SORN.¹

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

Yes. myUSCIS was approved for operation on December 18, 2014, for a period of 36 months, unless a significant change to the information system requires an earlier accreditation. The myUSCIS Authority to Operate is set to expire on December 18, 2017. The myUSCIS Security Plan was completed on December 10, 2014.

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

No. USCIS is developing a retention schedule with NARA for myUSCIS that is subject to final approval.

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 feedback surveys are subject to the PRA requirements. USCIS is seeking approval under OMB Control Number 1615-0121, which covers the collection of customer satisfaction surveys.

¹ DHS/USCIS-007 Benefits Information System, 81 FR 72069 (Oct. 19, 2016).

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.

myUSCIS helps online customers navigate the immigration process. On myUSCIS, customers are able to find up-to-date information about the application process for immigration benefits, case status, tools to help online customers prepare for naturalization, and resources to find citizenship preparation classes and doctors in their local community. Each digital service collects and uses PII for separate purposes. See the Appendices for a complete overview of operational digital services, lists of collected data elements, and uses of the information.

Customer Feedback Survey

myUSCIS provides a voluntary short feedback survey. The purpose of the survey is to determine the quality of the digital service from the end-user perspective. The online customer is able to identify whether the information was helpful and how it was helpful. An open textbox is available to the online user to provide additional feedback.

Technical Information

Google Analytics automatically collects session information about each visit on behalf of USCIS. This includes: Internet Protocol (IP) address (an IP address is a number that is automatically assigned to a computer when surfing the Internet); date and time of visit; content visited or downloaded; operating system information about the device or browser used when visiting the site; and website (such as google.com or bing.com) or referral source (email notice or social media site) that connected the customer to the website.

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

USCIS collects information directly from the USCIS online customer using the digital service during his or her visit.²

² See USCIS Website Privacy and Legal Disclaimers available at <https://www.uscis.gov/website-policies/privacy-and-legal-disclaimers>.



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.

myUSCIS receives information directly from the individual, which helps ensure data accuracy. With the exception of the technical information listed above, USCIS does not retain information collected for the tools.

2.5 Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: myUSCIS may store information that is outdated, inaccurate, irrelevant, or incomplete.

Mitigation: myUSCIS does not require online customers to register, provide, or certify the veracity of any information that is provided. For certain digital services, myUSCIS online customers may submit information to myUSCIS directly to render a digital service. All information collected by the digital service is submitted by the individual, therefore the online customer reviews the accuracy and integrity of the information prior to submission. For example, the digital service provides the individual with an opportunity to enter biographic information, review its accuracy, and amend it prior to confirming its accuracy. With the exception of the appointment scheduler, myUSCIS does not capture or retain what is entered as part of a search. Online customers who use myUSCIS to schedule appointment can also update and cancel their appointments prior to the scheduled appointment. Please see Appendix F for more information.

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.

myUSCIS helps online customers navigate the immigration process. myUSCIS uses the information collected to respond to the individual's query. USCIS uses the results (*i.e.*, 'yes' or 'no' counts) from customer satisfaction surveys to determine if modifications to the digital services are needed to improve customers' use of the digital services. USCIS uses Google Analytics to collect session data. The data is automatically sent to the software's system and the system immediately aggregates the data, masks the IP address, and creates a separate unique identifier for the browser history. Neither USCIS nor the third-party vendor has access to the specifics of the



online customer's particular site visit. No sensitive PII is collected or used. USCIS only views the aggregate data from all online customers for a particular time period. USCIS uses the aggregated data to help improve online customer experiences.

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. Google collects session data on behalf of USCIS to improve the quality of the web features. myUSCIS uses the web metrics to improve customer service, correct technical issues, and better plan for future development.

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 myUSCIS will collect and use information in a manner inconsistent with USCIS' authority and mission.

Mitigation: myUSCIS does not require online customers to register or provide PII. Part of USCIS' mission is to provide effective customer-oriented immigration benefit and information services. USCIS created myUSCIS to help fulfill this goal. USCIS mitigates the risk of collecting and using information in a manner inconsistent with USCIS' authority and mission by minimizing the amount of information collected and by limiting the purposes for which USCIS may use the information. USCIS receives session information from Google Analytics to assess the online customer's visit.

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

Mitigation: USCIS mitigates this risk by making participation voluntary, and by ensuring that USCIS only receives results and that the results are not associated with an individual or personal identifier.



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, associated SORN(s), and the USCIS Privacy Policy. Additionally, myUSCIS 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.

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 information is voluntary. A customer can choose to decline to provide information; however, that may prevent the customer from using the myUSCIS digital services. By using the digital service, the customer is implying consent to USCIS' uses of information, but he or she does not have the ability to consent for specific uses.

4.3 Privacy Impact Analysis: Related to Notice

There is no privacy risk related to notice. All information collected by myUSCIS is provided directly from the customer. He or she is provided notice prior to submitting any information to USCIS.

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.

USCIS is developing a retention schedule for myUSCIS and its digital services that is subject to final approval by NARA.



5.2 Privacy Impact Analysis: Related to Retention

Privacy Risk: myUSCIS does not have a records retention schedule.

Mitigation: This risk is partially mitigated. USCIS is developing a retention schedule for myUSCIS and will not delete records until a retention schedule is approved by NARA. USCIS is working with NARA to set a retention schedule for myUSCIS data.

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.

Generally, myUSCIS does not collect or share sensitive PII about online customers. However, while an online user browses on the USCIS website, session information about their visit is automatically collected by Google Analytics. Through the General Services Administration (GSA) Data Analytics Program (DAP), USCIS uses Google Analytics measurement software to collect the information.³ The data are automatically sent to Google's system and the system immediately aggregates the data. This information is gathered to improve USCIS' websites and USCIS has chosen to not share the aggregate data with Google.

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

USCIS does not share information collected by myUSCIS with external entities.

6.3 Does the project place limitations on re-dissemination?

USCIS does not share information collected by myUSCIS with external entities.

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

USCIS does not share information collected by myUSCIS with external entities.

³ The DAP, provided by GSA to all federal executive branch agencies, delivers digital analytics tools (like Web analytics and customer satisfaction survey tools), performance metrics guidance, metrics benchmarks, and training. Please visit <https://www.digitalgov.gov/2015/03/04/what-is-the-digital-analytics-program-dap/> for more information.



6.5 Privacy Impact Analysis: Related to Information Sharing

USCIS does not share information collected by myUSCIS with external entities.

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?

myUSCIS allow individuals to directly engage with USCIS to obtain useful immigration and case-related information. If a Freedom of Information Act (FOIA) or Privacy Act (PA) concern arises, customers maintain the right to file a FOIA and/or PA request to gain access to or amend their USCIS records.

Any individual seeking to access information maintained by should direct his or her request to the following address:

USCIS National Records Center (NRC)

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 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.

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

myUSCIS allows online customers to directly engage with USCIS on obtaining immigration and case information. Individuals may also direct all requests to contest or amend information to the FOIA/PA Office at USCIS at the address listed above. In the redress request, individuals must state clearly and concisely the information being contested, the reason for contesting it, and the proposed amendment to the information.



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 through myUSCIS, the National Customer Service Center, this PIA, and the applicable SORN(s).

7.4 Privacy Impact Analysis: Related to Redress

There is no privacy risk related to redress. USCIS provides individuals multiple opportunities during and after the completion of the benefit request process to correct information. Additionally, individuals may request access to information about themselves under the FOIA and Privacy Act.

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?

USCIS ensures that the practices stated in this PIA are followed by leveraging training, policies, rules of behavior, and auditing and accountability.

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

All USCIS 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?

myUSCIS is a public-facing website and accessible to any individual seeking immigration or case-related information. Internal access to myUSCIS is restricted by USCIS management and limited to approved USCIS personnel and contractor staff.



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 does not share myUSCIS data with external entities. Through the GSA DAP, USCIS uses Google Analytics measurement software to collect session information. The data is automatically sent to Google's system and the system immediately aggregates the data. Neither USCIS nor Google have access to the specifics of an online user's particular site visit. USCIS and Google can only see the aggregate data from all online users for a particular time period.

Responsible Officials

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APPENDIX A

Help Center

Background:

The *Help Center* was created to help online customers find information readily within the USCIS.gov website. The current search engine finds outside source information before finding information within the www.uscis.gov site. The Help Center is an easy-to-search knowledgebase that lets online customers ask general immigration questions in their own words, get the answers they need with access to other helpful resources, or inform USCIS if the answer provided needs to be improved. Results displayed are prioritized based on the popularity of the result. If a previous user clicked on the response option, then frequency use is increased by one. Highest frequently used responses are moved to the top of the results page. The Help Center does not answer case-specific questions.

Information Collected, Retained, and Disseminated:

The *Help Center* aims to simplify the online customer's search and navigation of the USCIS website. No PII is collected, used, or maintained.

Source of Information:

The *Help Center* searches through the USCIS website for information to share with the online customer.

Category of Individuals Affected:

Online customers who are seeking immigration-related information.

Privacy Analysis:

Privacy Risk: There is a risk that individuals may input case related information into the *Help Center* search engine.

Mitigation: The *Help Center* offers online customers a text box to enter their question. In the event the customer enters case specific information, the search yields no results and will suggest searching by a general topic, such as naturalization and citizenship. myUSCIS only collects session data as part of the online transaction. myUSCIS does not capture or retain what is entered as part of the search.



APPENDIX B:

Explore My Options

Background:

Explore My Options is a tool that assists customers with identifying immigration benefits for which they may qualify and allows potential customers to learn about immigration benefits, associated forms and fees, and required documentary evidence. *Explore My Options* requires the customers to answer a few non-identifying questions from a drop down menu, such as their immigration status, and provides the types of benefit for which they may be eligible to apply. Users are also presented with all of the downloadable forms required to apply for a benefit.

Information Collected, Retained, and Disseminated:

Explore My Options allows online customers to select options under immigration categories of non-identifying information about who they are and what they want to accomplish through the immigration process. *Explore My Options* does not collect, use, maintain, or disseminate PII.

Source of Information:

Explore My Options collects non-identifying information (i.e., current immigration status and immigration goal) from the individual to narrow down the immigration options available to his or her under immigration law.

Category of Individuals Affected:

Online customers seeking to learn which immigration benefits for which they may be eligible.

Privacy Analysis:

Privacy Risk: There is a privacy risk that the *Explore My Options* tool may provide inaccurate information to the online customer on which immigration and non-immigration benefits he or she may be eligible to apply.

Mitigation: *Explore My Options* is a tool that allows online customers to tell USCIS a little about themselves so that the tool can present the individual with immigration options for which he or she might be eligible to apply. To mitigate this risk, myUSCIS provides a disclaimer advising the online customer that the *Explore My Options* tool is not intended to provide legal advice. Given the complex nature of each person's case, USCIS cannot assume legal liability for the accuracy, or completeness of any information discussed on or through this tool as Immigration law is complex and the information provided on this website might not fully address the online



customer's situation. USCIS recommends consulting with a licensed attorney or with a nonprofit agency accredited by the Board of Immigration Appeals for legal advice.

APPENDIX C

Find a Doctor

Background:

Every year, millions of people file an application to adjust their status in the United States to become lawful permanent residents. An integral part of the adjustment process is ensuring that applicants complete a medical exam through a doctor authorized by USCIS. This process ensures that individuals applying for permanent residence do not pose a risk to the public health of the United States.

Physicians are required to apply for Civil Surgeon designation with USCIS. USCIS uses the National Benefits Center (NBC) Processing Workflow Repository (NPWR) to process the Civil Surgeon application.⁴ myUSCIS receives an exact replica of limited NPWR data on the location of civil surgeons on a nightly basis and stores the information in its staging tables.

USCIS notifies physician applicants that USCIS provides a list of civil surgeons for public use in the form instructions. The following two USCIS customer service avenues assist customers with finding a civil surgeon: (1) visit the USCIS Web site at *my.uscis.gov/findadoctor*; or (2) call the USCIS National Customer Service Center.⁵ USCIS shares the civil surgeon's name, office name, office address, office telephone number, and any other relevant professional information the Civil Surgeon.

Online users who wish to locate a civil surgeon may visit the *Find a Doctor* tool on myUSCIS to search through a list of USCIS-authorized doctors in their area. *Find a Doctor* is a filtering tool that allows the online uses to search by address, zip code, or city. Once the online user enters address information, myUSCIS generates a list of doctors within the specified radius or parameters. The results are ranked by closest in distance and included an embedded third-party map. Online users may narrow down their search criteria based on the following preferences: gender, language spoken, accepted medical plan, handicap accessibility, and payment method.

The *Find a Doctor* tool also provides a "Get directions" or "Visit website" hyperlink. If the online user clicks on the hyperlink, the online user is redirected to a third-party, public-facing commercial website, to provide walking or driving directions or public transportation options or to the Civil Surgeon office, respectively. The third-party commercial website offers satellite imagery, street maps, 360 degree panoramic views of streets, real-time traffic, etc. The third-party commercial website may request a 'starting address' if the online user desires map directions to the selected

⁴ See Forthcoming Civil Surgeon Designation PIA, soon to be available at www.dhs.gov/privacy.

⁵ See DHS/USCIS/PIA-054 National Customer Service Center, available at www.dhs.gov/privacy.



office. myUSCIS will have a “pop-up” disclaimer notifying the customer that the customer is being redirected to a non-USCIS site and is then no longer engaging with myUSCIS.

Information Collected, Retained, and Disseminated:

The *Find a Doctor* tool collects address information [street address, zip code, and/or city] from online customers seeking to find an authorized civil surgeon. myUSCIS uses this information to retrieve information from NPWR and generate a list of civil surgeons based on the individual’s search criteria. The actual search and its results are not stored by myUSCIS or its staging tables.

Source of Information:

Online users enter their address information and select their preferences directly into the *Find a Doctor* tool. myUSCIS pulls approved Civil Surgeons from NPWR, which is the USCIS case management system for civil surgeon applications.

Category of Individuals Affected:

Online users are able to search through a list of all USCIS-authorized doctors in their area.

Privacy Analysis:

Privacy Risk: There is a privacy risk that the online customer may be redirected and share information to a third-party website unknowingly and customer address data is subsequently shared without the consent of the individual.

Mitigation: This is partially mitigated. myUSCIS contains links to commercial entities, and are not within USCIS’ control and may not follow the same privacy, security, or accessibility policies. Once an online customer links to another site, the online customer is subject to the policies of the third-party commercial site. myUSCIS will have a “pop-up” disclaimer notifying the customer that the customer is being redirected to a non-USCIS site and is then no longer engaging with myUSCIS.

APPENDIX D

Find a Class

Background:

Naturalization is an important milestone in the path toward U.S. citizenship. The decision to apply for citizenship is a very personal one. Many community organizations and social service providers offer citizenship classes and assistance with the naturalization process. To enhance educational resources and promote opportunities to increase the understanding of U.S. civic principles and citizenship, USCIS consolidated a list of English as a Second Language (ESL) and citizenship preparation classes from the Department of Education. Also included is a list of Citizenship and Integration Grant Recipients from USCIS Office of Citizenship. This list is uploaded onto myUSCIS staging tables.

Online users who wish to locate an ESL classes, citizenship preparation classes, and low-cost USCIS-funded programs⁶ may visit the *Find a Class* tool on myUSCIS. *Find a Class* is a filtering tool that allows the online users to search by address, zip code, or city. Once the online user enters his or her address information, myUSCIS generates a list of classes within the specified radius or parameters. The results are ranked my closest in distance and include the business name, address, and phone number, as well as an embedded third-party map. Online users may narrow down this or her search criteria based on class type.

The *Find a Class* tool also provides a “Get directions” or “Visit website” hyperlink. If the online user clicks on the hyperlink, the online user is redirected to a third-party, public-facing website, to provide walking or driving directions or public transportation options or to the class webpage, respectively. The third-party commercial website offers satellite imagery, street maps, 360 degree panoramic views of streets, and real-time traffic. The third-party commercial website may request a ‘starting address’ if the online user desires map directions to the selected office. USCIS will not collect the starting address or any information collected by the third-party commercial website. myUSCIS will have a “pop-up” disclaimer notifying the customer that the customer is being redirected to a non-USCIS site and is then no longer engaging with myUSCIS.

Information Collected, Retained, and Disseminated:

Online users enter their address information in the *Find a Class* tool and a list of ESL classes, citizenship preparation classes, and USCIS-funded classes are displayed. Information about the

⁶ USCIS grant recipients offer free or low cost services to immigrants. Search a list of USCIS-funded programs and their available services. Many of these organizations offer services in additional locations.

classes includes the business name, address, phone number, and web address. *Find a Class* does not collect, retain, or disseminate any address data.

Source of Information:

USCIS uploads .csv files from the Department of Education for ESL and citizenship preparation classes and the Office of Citizenship for grantees onto myUSCIS staging tables.

Category of Individuals Affected:

Online users are able to search and locate ESL classes, citizenship preparation classes, and low-cost USCIS-funded programs in his or her area.

Privacy Risks & Mitigations:

Privacy Risk: There is a risk that the *Find a Class* tool maintains an inaccurate list of ESL and civic preparation courses.

Mitigation: This risk is partially mitigated. USCIS relies on public and private organizations to provide up-to-date class information. It is the responsibility of the organization to keep its information updated, so the information may be out-of-date. USCIS advises the online customers to check with the organization directly to see what services are available.

APPENDIX E

Citizenship Resources

Background:

Citizenship Resources contain plain language information to help guide the customer through the naturalization process. For example, the *Citizenship Resources* pages provide information on list of steps that need to be accomplished to obtain U.S. Citizenship, and individuals' rights and responsibilities. These are static page with descriptions listed under each step. There is no PII collected.

Practice Civics Test:

myUSCIS offers the *Civics Practice Test* module, which is an interactive study tool to help online customers test their knowledge of U.S. history and government. This practice test contains 20 questions. Online customers have the option to review the questions in English only or in English with Spanish subtitles. The actual test is in English. Online customers may use this online tool to prepare for the civics portion of the naturalization test. No PII collected and practice exams are not associated with any individual.

Information Collected, Retained, and Disseminated:

Citizenship Resources and *Practice Civics Test* does not collect, retain, or disseminate any data.

Source of Information:

Not applicable.

Category of Individuals Affected:

Not applicable.

Privacy Risks & Mitigations:

There is no privacy risk associated with *Citizenship Resources* because no PII is collected and practice exams are not associated with an individual.

APPENDIX F

InfoPass

Background:

InfoPass is an online tool used to create an appointment with an USCIS office (domestic or overseas).⁷ InfoPass guides online 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 also collects the following information:

- Customer first name (required);
- Customer middle name (optional);
- Customer last name (required);
- Customer phone number (required);
- Customer email address (required for international appointments);
- Case number (A-Number or receipt number) (optional); and
- Number of attendees (optional).

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; and location.

Customers can review and reprint a copy of their confirmation appointment notice from any computer that is connected to the internet 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. Customers can also use InfoPass to manage appointments.

⁷ See DHS/USCIS/PIA-046 Customer Scheduling and Services available at www.dhs.gov/privacy.

**Information Collected, Retained, and Disseminated:**

InfoPass collects the following information from the online customer to schedule an appointment:

- Customer first name (required);
- Customer middle name (optional);
- Customer last name (required);
- Customer phone number (required);
- Customer email address (required for international appointments);
- Case number (A-Number or receipt number) (optional); and
- Number of attendees (optional).

myUSCIS is the web-facing portion of InfoPass and passes the collected information to the National Appointment Scheduling System (NASS) to store. myUSCIS serves as the web interface for customers and NASS supports internal scheduling management.

Source of Information:

InfoPass collects information directly from the online customer to schedule an appointment with a USCIS field and international office.

Category of Individuals Affected:

Online customers are benefit requestors and accredited representatives.

Privacy Analysis:

Privacy Risk: If an appointment is created at a public computer, upon completion of creating an appointment, if the customer walks away without closing the screen, PII is vulnerable.

Mitigation: myUSCIS screens time out after less than 1 minutes of inactivity and will ask the online customer if he or she would like to extend his or her use of the appointment scheduling system. After a minute of inactivity, the program reverts back to the landing page and data collected is cleared.

APPENDIX G

Family Reunification Parole (FRP) Programs Invitational Tool

Background:

The Department of Status (DOS) National Visa Center (NVC) mails invitations to individuals who may be eligible to apply for parole under the Haitian Family Reunification Parole (HFRP)⁸ or Cuban Family Reunification Parole (CFRP) program.⁹ The receipt of an invitation letter is currently the only guarantee customers have that they are eligible to apply to the HFRP or CFRP program. Customers who do not have a current address on file and who consequently do not receive an invitation may not know that they are eligible to apply. Their only recourse is to call the National Customer Service Center. The NCSC refers to an Excel spreadsheet provided by DOS. USCIS created the *FRP Programs Invitational Tool* to help customers determine whether or not they are eligible to apply for these programs without having to call the NCSC.

DOS emails a password-protected Excel spreadsheet to USCIS that lists the individuals who were mailed an HFRP or CFRP invitation. Information sent to USCIS from DOS includes: DOS case number, petitioner's last name, petitioner's first name, petitioner's date of birth, beneficiary's last name, beneficiary's first name, and beneficiary's date of birth. USCIS converts the entire spreadsheet to a .csv file and uploads it on to the myUSCIS staging table support of the *FRP Program Invitational Tool*.

FRP Programs Invitational Tool allows online customers to verify whether the NVC has issued them an invitation to apply to the HFRP or CFRP programs. Online customers enter their DOS case number, and hits 'check for invitation' to initiate a search.¹⁰ The tool then compares that information against a list of petitioners who were sent an invitation to participate in either the HFRP or CFRP program. myUSCIS will compare the DOS case number entered against data in the staging table. The status tool provides a simple confirmation or non-confirmation of whether an invitation was issued to the individual, along with additional information on next steps.

Information Collected, Retained, and Disseminated:

FRP Programs Invitational Tool collects the DOS case number, and may collect the online user's name and date of birth, to initiate a search. The tool checks these data attributes against the staging

⁸ <https://www.uscis.gov/HFRP>

⁹ <https://www.uscis.gov/humanitarian/humanitarian-parole/cuban-family-reunification-parole-program>

¹⁰ Future versions of the FRP Programs Invitational Tool may ask for additional customer information. Fields would be limited to those currently provided to USCIS by DOS on the password-protected Excel spreadsheet.

tables to determine whether or not the petitioner was sent an invitation letter to participate in HFRP or CFRP.

Source of Information:

The *FRP Programs Invitational* tool pings the myUSCIS staging table, which has uploaded a .csv file from the DOS. The file contains the DOS case number, petitioner first and last names and date of birth, and the beneficiary first and last names and date of birth. The query and query results are not maintained by myUSCIS.

Category of Individuals Affected:

FRP Programs Invitational maintains information on petitioner's who were mailed invitations to apply for benefits under the CFRP and HFRP for his or her family

Privacy Analysis:

Privacy Risk: There is a privacy risk that the DOS supplied spreadsheets are inaccurate and untimely.

Mitigation: This risk cannot be mitigated. DOS provides USCIS with an updated list throughout the year. Each time the list is updated, myUSCIS will update the list accordingly.



APPENDIX H myUSCIS Usability Testing and Ethnographic Research

Background:

USCIS is launching myUSCIS as a new digital service to shift away from traditional call centers. myUSCIS simplifies the immigration processes for its customers. The purpose of this service is to offer USCIS' customers a wider range of online services. myUSCIS features easy to use interfaces and intuitive tools aimed at reducing confusion about general immigration information and eligibility for benefits.

Customer feedback is essential to continuously enhance the overall myUSCIS design and user online experience. The myUSCIS team is conducting usability testing and ethnographic research while developing myUSCIS. Usability Testing is a technique used in user-centered interaction design to evaluate a product by testing it on its users. Users are able to share direct input to USCIS on the overall user experience and myUSCIS features.

Ethnographic research allows the myUSCIS team to immerse themselves in the lives, culture, or situation of its users to understand why people seek their benefit or status. Ethnography is a type of social research. In ethnography, research is conducted in the field, where users' real-world behaviors and interactions with products and services take place, so that researchers can gain insight into how context impacts the user's overall online experience. Through ethnographic research, USCIS is able to understand how history and context (i.e., issues, settings, environment and relationships) play an important role in the lives of benefit requestors and may design myUSCIS to better meet the user's online needs.

For both initiatives, USCIS obtains participants through the aid of Community Based Organizations (CBO), grantees, and attorney partners with the Public Engagement Division of the Customer Service and Public Engagement Directorate (CSPED). The aforementioned organizations may solicit participants on USCIS' behalf, and help coordinate locations to meet and conduct the myUSCIS usability testing and/or ethnographic research. USCIS may also obtain participants directly from USCIS customers that are interacting with USCIS. USCIS may randomly approach customers at designated locations (i.e., at a CBO event, at a Public Engagement event, or at the Field Office waiting room) to see if they are willing to participate in a usability or ethnographic research study. Participants are informed that participation is completely voluntary, and will have no impact on the outcome of their case.

The myUSCIS Usability Testing and Ethnographic Research teams are responsible for guiding the participants through the usability tasks or questions and collecting feedback. The myUSCIS Usability Testing and Ethnographic Research teams are composed of USCIS employees whom act as moderators or observers. The moderator interacts with the participants and guides the participants through the usability testing or/ethnographic research. There are multiple observers to ensure the participant's actions are captured. The observers are also responsible for taking notes on the difficulty of the tasks and to capture any pertinent comments.

The usability test and ethnographic research are conducted in three distinct phases. These include:



1. The Introduction phase- The moderator makes introductions, including the USCIS testing team members' first names and roles. The purpose of the introduction phase is to introduce myUSCIS and to identify the participants': technology proficiency, English proficiency, and level of interaction with myUSCIS.gov. The introduction also lays out the expectations of the participant and outlines the testing logistics.
2. Testing Phase- For the usability testing, the participants are introduced to the website page in question and are provided a series of tasks to perform in myUSCIS. No personally identifiable information is collected when performing usability testing. Mock data is given to the participants. The participants are asked to talk through the tasks and to provide comments on the ease of the tasks, as well as provide suggestions for improving the website to achieve the specific tasks. As participants comment on what they are doing and seeing, the observer documents the participants' comments and actions for trend analysis. Observer notes are anonymous and are not linkable to the participant.

During the ethnographic research, the myUSCIS Ethnographic Research team also listens to participants to learn about the reasons why they are seeking their benefit or status, what events in their lives prompted them to apply for immigration benefits, and the immigration experience for both participants and family members involved in the immigration process. This study informs website design decisions that myUSCIS developers take into consideration on how it may deliver services and features to the public. The myUSCIS team listens for themes in the stories and observes the immigration journey of the participants. Again, observer notes are anonymous and are not linkable to the participant.

3. Feedback Phase- At the conclusion of the interview, participants are asked about the usability testing task/questions, the length of the tasks, and for any closing comments. USCIS Usability Testing and Ethnographic Research teams type up this feedback and notes are saved on a secure CSPED shared drive. Notes are anonymous and are not linkable to the participant. The participant feedback is aggregated for reporting and trend analysis. Once feedback is collected, myUSCIS teams review the results to identify areas of improvement for myUSCIS product designs and services.

Information Collected, Retained, and Disseminated:

Participants are either invited through a public invitation, published in advance of the research study, or are invited in-person while USCIS researchers are on-site at designated locations. Participants are informed that participation is completely voluntary, and will have no impact on the outcome of their case.

The myUSCIS Usability Testing and Ethnographic Research teams monitor the participant's experience. All feedback is anonymous and aggregated for reporting and trend analysis. Once feedback is collected, myUSCIS teams review the results to identify areas of improvement for myUSCIS. USCIS Usability Testing and Ethnographic Research teams type up



the feedback and notes are saved on a secure CSPED shared drive. Notes are anonymous and are not linkable to the participant.

Sources of Information:

USCIS collects participant feedback directly from the individual participating in the usability test and/or ethnographic research.

Category of Individuals Affected:

Individuals who volunteer to participate in the usability test and/or ethnographic research.

Privacy Analysis:

Privacy Risk: There is a risk that negative feedback could be inappropriately used to adversely impact the individual's benefit request.

Mitigation: USCIS mitigates this risk by making participation completely voluntary and by ensuring that USCIS only receives results that are not associated with an individual. Participants are informed that participation is completely voluntary, and will have no impact on the outcome of their case. The USCIS Usability Testing and Ethnographic Research teams verbally request the participant's name, however, it is not captured or linked to the individual.

Privacy Risk: There is a privacy risk that the information collected will be used beyond its original purpose.

Mitigation: The risk is mitigated. MyUSCIS serves as a convenient source for trusted immigration and pending case information. Part of the USCIS' mission is to provide effective customer-oriented immigration benefit and information services. As a resource dedicated to online customers, USCIS relies on customer feedback to improve the overall customer experience. USCIS conducts usability tests and ethnographic research to collect data from customers about their experiences and the level of satisfaction with the services from myUSCIS. Obtaining customer feedback through these channels is an important aspect in evaluating a new myUSCIS service. Results from these assessments are used by USCIS to change and modify different aspects about myUSCIS in order to improve customer satisfaction. USCIS limits the customer's feedback to assessing the overall usability of myUSCIS or personal immigration experience to design myUSCIS. USCIS does not link the responses back to the participants' official immigration records.

Privacy Risk: There is a privacy risk that the myUSCIS Usability and Ethnographic Research teams will fail to protect the anonymity of participants.

Mitigation: The risk is mitigated. USCIS ensures that the practices stated in this Appendix are followed by leveraging training, operational policies, and supervisor oversight. The myUSCIS usability team is trained in user research and advised to focus on collecting feedback from the



participants rather than the identity of the participant. During the training, both teams are trained to identify participants numerically (e.g., Participant 1 and Participant 2) instead of by name to ensure the anonymity of participants. The myUSCIS Usability and Ethnographic teams follow a uniform process to ensure the continuity of operations. At the end of each interview, the team debriefs and reviews their notes to ensure all insights are captured, anonymous, and communicated across the team. The purpose of the notes is to conduct an exercise to map and organize the key insights into the themes gathered from the participants. Throughout the study, the organizational map continues to evolve to capture trends gathered from participants and does not include PII. Based on the findings, the team may revise the interview guide and research approach accordingly.



Appendix I

Central American Minors (CAM) Parole Program Lookup Tool

Background:

The Central American Minors (CAM) Program,¹¹ established in 2014, provides certain qualified children who are nationals of El Salvador, Guatemala, and Honduras, as well as certain family members of those children, an opportunity to apply for refugee status and possible resettlement in the United States. Individuals who were initially determined to be ineligible for refugee status were then considered by USCIS for the possibility of entering the United States under parole. However, the parole portion of the CAM program was terminated in August 2017 and USCIS is no longer automatically considering or offering parole for individuals denied refugee status in El Salvador, Guatemala, and Honduras under the CAM Parole program.

On April 12, 2019, the Department of Homeland Security (DHS) and plaintiffs reached a settlement agreement in *S.A. v. Trump*, 18-cv-03539 (N.D. Cal), in which DHS agreed to resume processing of a specific class consisting of 2,700 beneficiaries who were conditionally approved for parole, but had not traveled to the United States before DHS terminated the CAM Parole program.¹² Although USCIS will resume processing these specific cases, the CAM Parole program itself remains terminated.

CAM Parole Program Lookup Tool

The Department of State (DOS) and USCIS collaborate to manage the resettlement of eligible refugees in the United States.¹³ The DOS developed the DOS Worldwide Refugee Admissions Processing System (WRAPS),¹⁴ a case management system used for the facilitation of the refugee resettlement process. WRAPS tracks refugee applicants as they move through the required processing steps until arrival in the United States. DOS WRAPS generates a unique case ID number for each CAM parole case. USCIS created the CAM Parole Program Lookup Tool to help individuals determine whether or not USCIS has reopened their previously terminated CAM case for continued processing. The CAM Parole Program Lookup Tool is a web-hosted form that will allow any public user to check if his or her DOS WRAPS case number is on the list for resumed processing for CAM parole. The tool uses the Case and Activity Management for International Operations¹⁵ (CAMINO) system to pull information from an Excel spreadsheet

¹¹ <https://www.uscis.gov/CAM>.

¹² <https://www.uscis.gov/humanitarian/humanitarian-parole/central-american-minors-cam-information-parole-applicants>.

¹³ See DHS/USCIS-017 Refugee Case Processing and Security Screening Information, 81 FR 72075 (Oct. 19, 2016), available at <https://www.dhs.gov/system-records-notices-sorns>.

¹⁴ WRAPS is the DOS case management database used for all refugee applicants processed for resettlement consideration to the U.S. Please see the WRAPS PIA and SORN for more information on this system and the information it collects, uses, and maintains. Available at <http://www.state.gov/documents/organization/101146.pdf>.

¹⁵ For more information about the CAMINO system, see DHS/USCIS/PIA-051 Case and Activity Management for



containing DOS WRAPS case numbers associated with cases that will be reopened and processed for CAM parole. USCIS stores the list of case numbers in an encrypted table in the Customer Service Web Portal (CSWP) in support of the CAM Parole Program Lookup Tool.

Use of the tool is voluntary and was developed to aid individuals in determining if USCIS has reopened their previously terminated CAM case for continued processing. Members of the public will not be required to log into a USCIS system to check the DOS WRAPS case number. The DOS WRAPS case number is the only piece of information an individual must provide to determine whether his or her case will be processed. In response, the tool will return a message to the user indicating if the DOS WRAPS case number was affected by the settlement and is therefore on the list for processing, or whether the case number was not affected by the settlement and therefore not on the list for processing. No other information will be provided to the individual.

Information Collected, Retained, and Disseminated:

Individuals enter their DOS WRAPS case number in the CAM Parole Program Lookup Tool to determine if they are eligible for resumed processing of CAM Parole. A response message displayed to the user indicates whether his or her case number is or is not on the list for processing through the CAM Parole Program. The case numbers entered and the responses provided to the individual are not maintained and stored by USCIS or the CAM Parole Program Lookup Tool.

Sources of Information:

The CAM Parole Program Lookup Tool queries the CSWP, which has uploaded an encrypted excel spreadsheet file pulled only once from the DOS WRAPS system via CAMINO. The file contains a list of valid DOS WRAPS case numbers associated with individuals who may be considered for parole under the CAM parole program. The DOS WRAPS case number and response messages are not maintained or stored by the CAM Parole Program Lookup Tool.

Category of Individuals Impacted:

Individuals input their DOS WRAPS case number in the CAM Parole Program Lookup Tool to learn if USCIS has reopened their case for resumed processing under the previous CAM Parole policy.

Privacy Analysis:

Privacy Risk: There is a privacy risk of the over-collection of data because any individual may submit a DOS Receipt Number to verify his or her eligibility for parole.

Mitigation: This risk is mitigated because although anyone can submit information via the CAM Parole Program Lookup tool, USCIS only collects session data (e.g., IP address) as part of the online transaction and will not maintain DOS WRAPS case numbers as part of its transaction

logs. Although any individual can submit a DOS WRAPS case number via the CAM Parole Program Lookup tool, USCIS does not retain this information.

Privacy Risk: The CAM Parole Program Lookup tool may store outdated or inaccurate information.

Mitigation: This risk is mitigated since the list of DOS WRAPS case numbers contain only those cases affected by the settlement and are therefore on the list for processing. This is a finite list which identifies the case numbers of approximately 2,700 beneficiaries who were conditionally approved for parole, but had not traveled to the United States before DHS terminated the CAM Parole Program in 2017. No updates will be made to this list as the program remains terminated.