



Privacy Impact Assessment Update
for the

USCIS Person Centric Query Service

Supporting

**Immigration Status Verifiers of the USCIS
National Security and Records Verification
Directorate/Verification Division**

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Abstract

This is an update to the existing Privacy Impact Assessment (PIA) for the United States Citizenship and Immigration Services (USCIS) Person Centric Query (PCQ) Service, operating through the USCIS Enterprise Service Bus (ESB) to describe the privacy impact of expanding the PCQ Service to include the following additional PCQ Client: the Immigrant Status Verifiers (ISVs) of the USCIS National Security and Records Verification Directorate/Verification Division (NSRV/VD).

Introduction

This is an update to the existing Privacy Impact Assessment (PIA) for the United States Citizenship and Immigration Services (USCIS) Person Centric Query (PCQ) Service, operating through the USCIS Enterprise Service Bus (ESB) to describe the privacy impact of expanding the PCQ Service to include the following additional PCQ Client: the Immigrant Status Verifiers (ISVs) of the USCIS National Security and Records Verification Directorate/Verification Division (NSRV/VD). The ISVs will be provided with access to the following existing connected systems: Aliens Change of Address System (AR-11), Central Index System (CIS), Citizenship and Immigration Services Centralized Operational Repository (CISCOR), Computer-Linked Application Management Information System 3.0 (CLAIMS 3), Computer-Linked Application Management Information System 4.0 (CLAIMS 4), Biometric Storage System (BSS), National File Tracking System (NFTS), Microfilm Digitization Application System (MIDAS), Department of State (DOS) Consular Consolidated Database (DOS-CCD), Reengineered Naturalization Applications Casework Systems (RNACS), and Immigration and Customs Enforcement (ICE) Student Exchange Visitor Information System (SEVIS).

The USCIS ESB is a set of commercial off-the-shelf software that provides a standardized infrastructure to connect to multiple systems and services within a Service Oriented Architecture (SOA). A separate PIA for the ESB is available on the Privacy Office website, www.dhs.gov/privacy. The PCQ Service is a composite service which allows users to submit a single query for all transactions involving an immigrant across a selected number of systems and returns a consolidated and correlated view of the immigrant's past interactions with the government as he or she passed through the U.S. immigration system. A separate PIA for the PCQ Service is also available on the Privacy Office website. A "PCQ Client" can be either an end user (a person) or another system invoking the PCQ Service query on behalf of an end user. A "connected system" is a system that the PCQ Service accesses to either retrieve or deliver information.

As part of the SOA, the PCQ Service is designed to be reusable in that multiple PCQ Clients and connected systems can be arranged in different combinations to simultaneously serve different needs without the cost of individual system development efforts. While technically, the same core "service" can be used and reused on an ongoing basis, the privacy assessment must be



conducted separately for each unique combination of PCQ Clients and connected system and each combination using personally identifiable information (PII) must satisfy the privacy compliance requirements prior to deployment.

The ISVs' use of the connected systems was analyzed for potential privacy impacts and USCIS PCQ Service, with approval from the DHS Privacy Office, determined that the addition of NSRV/VD ISVs complies with the existing privacy compliance documentation requirements. The existing PIAs and System of Records Notices (SORNs), related to the systems and information used in the NSVD/VD ISVs' PCQ Client and connected systems provide for the use of PII that is described in this PIA Update.

The owners of the connected systems providing the PII to be shared with the new PCQ Clients formally agreed to share the PII and NSRV/VD formally agreed to limit use of the PII to the manner described in this PIA Update.

The remainder of this PIA Update lists how the NSRV/VD ISVs will use the PCQ Service and verifies that the current privacy compliance documentation of each connected system accommodates the new PCQ Client's use of that system and the related PII.

Reason for the PIA Update

This section describes the new PCQ Client, the PCQ Client's intended use of the PCQ Service as well as enabling authority for that use, the connected systems to be used through the PCQ Service, and, for each connected system, a description of the system's purpose and existing privacy compliance documentation covering the new PCQ Client's intended use.

New PCQ Client: USCIS National Security and Records Verification Directorate/Verification Division

The National Security and Records Verification Directorate/Verification Division NSRV/VD of USCIS provides immigration status verification for benefits determinations and employment authorization. Presently, two programs exist to implement this mandate: (1) SAVE, for determining eligibility for government benefits; and (2) E-Verify, for determining whether a newly hired employee is authorized to work in the U.S. SAVE, and E-Verify are described more fully in the VIS SORN (67 FR 17569) and PIAs (www.dhs.gov/privacy).

The PCQ Service will be invoked by ISV within the NSRV/VD for secondary verification process to augment and enhance the efficiency of retrieving data from the various databases. The PCQ Service will allow NSRV/VD ISVs the ability to retrieve information from multiple systems with one search. ISVs currently are required to search each of these systems individually in order to make a determination about the status of an individual.



The authority to collect and retrieve information through the PCQ Service is set forth in the Immigration and Nationality Act, 8 USC 1101, 1103, 1304 et seq., and implementing regulations found in 8 CFR. The Privacy Impact Assessment for this system is titled USCIS Person Centric Query (PCQ) Service dated June 22, 2007.

Connected IT Systems

A review of each of the below connected systems determined that NSRV/VD's intended use of PII is covered by published privacy compliance documents, most of which are available on the Privacy Office website, www.dhs.gov/privacy.

1. Aliens Change of Address System (AR-11)
2. Central Index System (CIS)
3. Citizenship and Immigration Services Centralized Operational Repository (CISCOR)
4. Computer-Linked Application Management Information System 3.0 (CLAIMS 3)
5. Computer-Linked Application Management Information System 4.0 (CLAIMS 4)
6. Biometrics Storage System (BSS)
7. National File Tracking System (NFTS)
8. Microfilm Digitization Application System (MIDAS)
9. DOS Consular Consolidated Database (DOS-CCD)
10. Reengineered Naturalization Applications Casework Systems (RNACS)
11. ICE Student Exchange Visitor Information System (SEVIS)

In this use of the PCQ Service, the data is requested by the end-user-- the ISV via the standard PCQ Service web user interface. The PCQ Service in turn performs the query and returns the results back to the ISV for display

ISVs using PCQ Service will use information available through all of the connected systems for a purpose that is similar to the purpose each of the connected systems currently use that same information: to query and review the record of an immigrant for the purpose of determining immigration status. Each of the connected systems provides a view of information related to individual immigrants which is specific to the benefit being managed by that connected system. While each of the connected systems may also provide other capabilities (Case Management, Adjudication Updates, Background Checks, etc.), ISVs will only use the PCQ Service for this single purpose.



1. Aliens Change of Address System (AR-11)

The Aliens Change of Address System (AR-11) collects and maintains immigrant and non-immigrant change of address records. The Alien's Change of Address Card System (AR-11) was established to maintain both immigrant and non-immigrant change of address records. The objectives of the AR-11 is to support the USCIS's priority for management information and integration; comply with the U.S. Code of Federal Regulations, National Archives and Records Administration specifications, Title 44 Chapter 32, dealing with management, control, and accountability of records maintained by DHS; facilitate transfer of hard copy files among DHS field locations; and provide statistical reporting to other agencies.

NSRV/VD will use the following information from AR-11:

- Name,
- Current Address,
- Date of Birth,
- Previous Address,
- Alien Number,
- Federal Bureau of Investigation Number (FIN),
- Admission Number, and
- Previous Address.

ISVs will use AR-11 as part of the secondary immigration status verification for both the SAVE and E-Verify programs. This purpose is similar to the purpose for the use of the same information by AR-11.

This IT system currently has no published PIA as it is a legacy system that was built prior to the enactment of the E-Government Act and the system itself has not undergone any substantial changes since 2002.

This IT system currently has no published SORN.



2. Central Index System (CIS)

The Central Index System (CIS) contains information on the status of 57 million applicants/petitioners seeking immigration benefits to include: lawful permanent residents, naturalized citizens, U.S. border crossers, aliens who illegally entered the U.S., aliens who have been issued employment authorization documents, individuals who petitioned for benefits on behalf of family members, and other individuals subject to the provisions of the Immigration and Nationality Act (INA).

All data and electronic images are being retained to fulfill the business requirements of DHS, which includes adjudication of decisions, law enforcement uses, protection of national security, responding to requests within DHS, as well as those requests from other government agencies requiring historical and/or biographical information on the individuals of interest.

ISVs will use the following information from CIS:

- Name,
- Date of birth,
- A Number,
- Mother's name,
- Father's name, and
- Alien Number and Alias name.

ISVs will use CIS as part of the secondary immigration status verification for both the SAVE and E-Verify programs. This purpose is similar to the purpose for the use of the same information by CIS.

The PIA for this connected system is entitled Privacy Impact Assessment for the Central Index System, published on June 22, 2007 and is available on the DHS Privacy Office website.

The SORN for this connected system is entitled DHS/USCIS-001 CIS/A-File SORN published January 16, 2007, in 72 FR 1755.

3. Citizenship and Immigration Services Centralized Operational Repository (CISCOR)

The Citizenship and Immigration Services Centralized Operational Repository (CISCOR) is a consolidated repository and reporting data mart for data pulled from the Claims 3 LAN instances from the four USCIS Service Centers and the National Benefits Center. CISCOR consolidates the Claims 3 Local Area Network (LAN) data into a single repository, which is centrally managed. This consolidation permits USCIS to generate internal productivity and management reports and



provide Congress with current statistics. CISCOR is targeted to provide an interim data source for USCIS systems requiring access to consolidated Claims 3 LAN data.

ISVs will use the following information from CISCOR:

- Receipt Number,
- Beneficiary A Number,
- Beneficiary Date of Birth,
- Beneficiary Country of Birth,
- Beneficiary Social Security Number (SSN),
- Beneficiary Last Name,
- Beneficiary First Name,
- Beneficiary Middle Name,
- Petitioner A Number,
- Petitioner SSN,
- Petitioner Naturalization Certificate Number,
- Petitioner First Name,
- Petitioner Last Name,
- Petitioner Firm Name, and
- Petitioner Tax Number.

ISVs will use CISCOR as part of the secondary immigration status verification for both the SAVE and E-Verify programs. This purpose is similar to the purpose for the use of the same information by CISCOR.

This system currently has no published PIA.

This IT system is covered by the DOJ/INS Claims 3/Claims 4 SORN, 62 FR 11919.

4. Computer-Linked Application Management Information System 3.0 (CLAIMS 3)

The Computer-Linked Application Management Information System 3.0 (CLAIMS 3) Mainframe is a mainframe database centered major application that supports processing of USCIS applications and petitions for various immigrant benefits (e.g. change of status, employment authorization, extension of stay, etc). It supports case management for and adjudication of all USCIS benefits except naturalization and citizenship.

ISVs will use the following information from CLAIMS 3:



- Receipt Number,
- Petitioner Name,
- Petitioner Address,
- Petitioner Internal Revenue Service (IRS) Number,
- Petitioner Date of birth,
- Petitioner SSN,
- Petitioner A Number,
- Attorney Name,
- Attorney Address,
- Beneficiary Name,
- Beneficiary Address,
- Beneficiary SSN, and
- Beneficiary A-Number.

ISVs will use CLAIMS 3 as part of the secondary immigration status verification for both the SAVE and E-Verify programs. This purpose is similar to the purpose for the use of the same information by CLAIMS 3.

This system currently has no published PIA.

This IT system currently is covered by the CLAIMS 3/CLAIMS 4 SORN, JUSTICE/INS-013, 62 FR 11919.

5. Computer-Linked Application Management Information System 4.0 (CLAIMS 4)

The purpose of the Computer-Linked Application Management Information System 4.0) CLAIMS 4 application is to process and manage applications for naturalization benefits and to provide event-scheduling support to CLAIMS 3 and RNACS. CLAIMS 4 was developed by the Immigration and Naturalization Service (INS) to assist in the processing of applications related to naturalization. Because of the increase in naturalization applications in recent years, an effort has been made to reengineer previous computerized naturalization systems to provide a more efficient and effective process.

ISVs will use the following information from CLAIMS 4:

- Alien Number,
- Name,



- Date of Birth,
- Naturalization Certificate Number, and
- Address.

ISVs will use CLAIMS 4 as part of the secondary immigration status verification for both the SAVE and E-Verify programs. This purpose is similar to the purpose for the use of the same information by CLAIMS 4.

This system currently has no published PIA.

This IT system is covered by the CLAIMS 3/CLAIMS 4 SORN, JUSTICE/INS-013, 62 FR 11919.

6. Biometric Storage System (BSS)

The Biometric Storage System (BSS) provides a searchable repository enabling access to digitized biometric information signatures, fingerprints, and photo images. BSS contains biographic data and biometric image data including photographs, signatures, and fingerprints. BSS enables USCIS, ICE, and CBP investigation and adjudication officers and agents rapid and easy access to this biometric and related biographic information to use in verifying the identity of registered aliens and in policing illegal entry into and residence in this country.

ISVs will use the following information from BSS:

- Applicant's biographic data, and
- Applicant's photograph.

ISVs will use BSS as part of the secondary immigration status verification for both the SAVE and E-Verify programs. This purpose is similar to the purpose for the use of the same information by BSS.

The PIA for this connected system is entitled Privacy Impact Assessment for the Biometric Storage System, published on March 28, 2007 and is available on the DHS Privacy Office website.

The SORN for this connected system is entitled DHS/USCIS--003 Biometric Storage System (BSS) SORN published April 6, 2007, in 72 FR 17172.

7. National File Tracking System (NFTS)

The purpose of the National File Tracking System (NFTS) system is to provide a centralized, automated, mechanism for determining the location of a physical A File and associated Receipt Files. NFTS supports the Records requirement to track files at the local level, as well as the national level. It is designed to support the Records mission and to provide efficient access to high-quality immigrant information by maintaining an accurate file inventory.



ISVs will use the following information from NFTS:

- A Number, and
- File Location.

ISVs will use NFTS as part of the secondary immigration status verification for both the SAVE and E-Verify programs. This purpose is similar to the purpose for the use of the same information by NFTS.

This system currently has no published PIA.

This system is covered by the Alien File/Central Index SORN. The SORN for this connected system is entitled DHS/USCIS-001 CIS/A-File SORN published January 16, 2007, in 72 FR 1755.

8. Microfilm Digitization Application System (MiDAS)

The Microfilm Digitization Application System (MiDAS) is an image-based search and retrieval application of digitized alien records on individuals who entered the United States (U.S.) between 1906 and 1975 (50-60 million records). MiDAS allows USCIS Office of Records to achieve a more effective search result and improved customer service. When digitization of all files is complete the MiDAS database will hold over 80 million records including Master Index, Flex-O-Line, A-files, Citizenship/Naturalization files (C-files, 129, 3904, OM, etc), file locator information cards, and other historical records.

ISVs will use the following information from MiDAS:

- Name,
- Alien Number,
- Date of birth, and
- Citizenship number.

ISVs will use MiDAS as part of the secondary immigration status verification for both the SAVE and E-Verify programs. This purpose is similar to the purpose for the use of the same information by MiDAS.

This system currently has no published PIA.

This system covered by the legacy INS Index System SORN, JUSTICE/INS -001, 58 FR 51847.



9. Department of State Consular Consolidated Database (DOS-CCD)

The DOS Consular Consolidated Database (DOS-CCD) is used by consular personnel as a resource for verifying prior visa issuances/refusals. It is also used by consular management for statistical reporting.

ISVs using NSRV/VD will use the following information from DOS-CCD:

- Name,
- Date of birth,
- Passport number,
- Visa control number,
- FOIL Number,
- Alien number, and
- Photograph.

ISVs will use DOS-CCD as part of the secondary immigration status verification for both the SAVE and E-Verify programs. This purpose is similar to the purpose for the use of the same information by DOS-CCD. While the data from DOS-CCD will be used for verification it will not be stored in VIS.

The PIA for this connected system is entitled U.S. Department of State 2006 Summary Privacy Impact Assessment, published October 2006 and is available on the Department of State website.

The corresponding System of Records Notice for this system is: Visa Records STATE-39, and can be found on the Department of State website (<http://foia.state.gov/issuances/STATE-39.pdf>).

10. Reengineered Naturalization Applications Casework Systems (RNACS)

The Reengineered Naturalization Applications Casework Systems (RNACS) is a case tracking system used to track applicants through the naturalization and citizenship process from initial data entry until issuance of citizenship or naturalization documents. RNACS maintains a status history of all actions performed on the case, schedules the cases for examinations and oath ceremonies, produces mailers for applicants and their representatives. Mailers are produced to inform those applicants and representatives of scheduled appointments and of decisions made in regards to the case. The system produces a wide variety of statistical reports upon users request. Officers and clerks in the citizenship branches of the district offices and sub-offices use RNACS.



ISVs using NSRV/VD will use the following information from RNACS:

- Alien Number,
- Name,
- Date of Birth,
- Naturalization Certificate Number, and
- Address

ISVs using NSRV/VD will use RNACS as part of the secondary immigration status verification for both the SAVE and E-Verify programs. This purpose is similar to the purpose for the use of the same information by RNACS.

This system currently has no published PIA.

This system is covered by a legacy INS SORN, JUSTICE/INS-031, 67 FR 20996 SORN.

11. Student Exchange Visitor Information System (SEVIS)

The Student Exchange Visitor Information System (SEVIS) maintains information on nonimmigrant students and exchange visitors (F, M and J Visas) and their dependents, and also on their associated schools and sponsors. SEVIS is an Internet-based system that allows DHS to collect, maintain, and use accurate and current information on nonimmigrant students, their dependents, and the approved schools and designated United States sponsors that host nonimmigrant students.

SEVIS enables schools and sponsors to transmit information, via the Internet, to DHS, ICE, and DOS throughout a student or exchange visitor's stay in the United States. SEVIS receives event notifications (electronic updates to SEVIS records on students and exchange visitors) and maintains up-to-date information about events involving nonimmigrant students and exchange visitors, such as visa issuance, admission at the Port-of-Entry (POE), registration at the school or validation of an exchange visitor's participation in their exchange program by the sponsor, changes of U. S. address, program extensions, employment notifications, and changes in program of study. SEVIS also provides system alerts, event notifications, and reports to the end-user schools and sponsors.

ISVs will use the following information from RNACS:

- Sevis ID,
- Name,
- Date of Birth,
- Birth Country,
- Class Of Admission Code,
- Admitted To Date,



- Status Change Date,
- Port Of Entry Code,
- Entry Date, and
- Program End Date.

ISVs will use SEVIS as part of the secondary immigration status verification for both the SAVE and E-Verify programs. This purpose is similar to the purpose for the use of the same information by USCIS.

The PIA for this connected system is entitled The Student And Exchange Visitor Information System (SEVIS) Privacy Impact Assessment, published on February 5, 2005 and is available on the Privacy Office website.

The SORN for this connected system is entitled Student and Exchange Visitor Information System DHS/ICE 001, 70 FR 14477, published March 22, 2005 and is available on the Privacy Office website.

Privacy Impact Analysis

There are two privacy risks related to adding a new user to each of the connected systems, and where indicated above, adding additional purposes for the use of the information. The first privacy risk is that the individual may not know that information provided in one context will be used by new additional users (“PCQ Clients” as defined in the PCQ Service PIA), potentially for new additional purposes. The second privacy risk is that PII used from external systems of records could be used for purposes that are not compatible with the purpose of the original collection.

Both privacy risks are mitigated through this PIA Update to the PCQ Service, identifying the new user and, as indicated above, the potential new purposes for the additional use. The PIA Update to the PCQ Service provides a review section for each of the connected systems and describes the original purpose and the anticipated new purpose of the new PCQ Client, indicating when those purposes are the same and when the purposes are different.

As noted in the PIA for the PCQ Service,¹ privacy risks are further mitigated by using strong matching algorithms and presenting the results in a single view (identifying each source system for that indicates each data set). This enables the user to directly compare information retrieved from multiple systems and determine whether there is inaccurate or incorrect information provided in the different systems.

¹ The PCQ Service PIA, “USCIS Person Centric Query (PCQ) Service June 22, 2007,” is available on the Privacy Office’s website: www.dhs.gov/privacy, in the Citizenship and Immigration Services (USCIS) section of the PIA webpage.



In order to clearly indicate the update uses of the information in these connected systems, the Privacy Office's website, www.dhs.gov/privacy, lists all updates to the PCQ Service PIA, specifically identifying each new user through a dedicated PIA Update. In addition, a link to the PIA Update will also be listed under each of the connected systems to similarly indicate which existing systems will have new users and, potentially, new purposes for the new use.

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