



Privacy Impact Assessment Update
for the

USCIS Person Centric Query Service

Supporting

Visa Benefit Adjudicators, Visa Fraud Officers, and Consular Officers
of the
Department of State, Bureau of Consular Affairs

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Contact Point

Harry Hopkins

Office of Information Technology (OIT)

United States Citizenship and Immigration Services

202-272-1700

Reviewing Officials

Donald Hawkins

Privacy Officer

United States Citizenship and Immigration Services

(202) 272-8000

Hugo Teufel III

Chief Privacy Officer

Department of Homeland Security

(703) 235-0780



Abstract

This is an update to the existing Privacy Impact Assessment (PIA) for the Department of State, Bureau of Consular Affairs (CA), Visa Benefit Adjudicators, Visa Fraud Officers, and Consular Officers (Adjudicators and Officers) use of the Person Centric Query Service (PCQS), operating through the U.S. Citizenship and Immigration Services (USCIS) Enterprise Service Bus (ESB) to: expand the PCQS person-search capability and describe the privacy impact of expanding the PCQ Service to include the following additional systems to the PCQS query for the Bureau of Consular Affairs, Adjudicators and Officers Client: 1) USCIS Marriage Fraud Amendment System (MFAS) and 2) USCIS Reengineered Naturalization Applications Casework System (RNACS).

Overview

USCIS provides the Person Centric Query Service through the USCIS Enterprise Service Bus (ESB), an infrastructure that supports the use of individual services within a Service Oriented Architecture (SOA). The USCIS ESB is a set of commercial off-the-shelf software that provides a standardized infrastructure to connect to multiple systems and services. 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 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 combination of PCQ Client(s) and connected system(s) addressed in this PIA Update for the PCQ Service were analyzed for potential privacy impacts and determined to comply with the privacy compliance documentation requirements. The existing Privacy Impact Assessment and System of Records Notices (SORNs) related to the systems and information used in the unique combination of PCQ Client(s) and connected system(s) 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 Client(s) formally agreed to share the PII and the new PCQ Client(s) formally agreed to limit use of the PII to the manner described in this PIA Update.

The remainder of this PIA Update lists the new PCQ Client(s) that 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, its intended use of the PCQ Service, including its enabling authority for that use. In addition, if the new PCQ Client is a system or program (as opposed to an end user – a person), this PIA Update cites to published privacy compliance documentation that provides for the use of the PII enabled through the PCQ Service.

On June 28, 2007 United States Citizenship and Immigration Services (USCIS) published on the DHS Privacy Office website www.dhs.gov/privacy a PIA for the United States Citizenship and Immigration Services (USCIS) Person Centric Query (PCQ) Service.

This is an update to the June 28, 2007 PIA for Bureau of Counselor Affairs, Adjudicators and Officers' use of the PCQS, operating through the USCIS Enterprise Service Bus (ESB) to 1) expand the PCQS person-search capability, and 2) describe the privacy impact of expanding the use of PCQS to Bureau of Counselor Affairs, Adjudicators and Officers with access to the following systems via a PCQS query: DOS-CCD, USCIS AR/11, USCIS CIS, USCIS CISCOR, USCIS CLAIMS 3, USCIS CLAIMS 4, USCIS MiDAS, USCIS NFTS, USCIS ISRS, USCIS MFAS, and USCIS RNACS.

Person Search

The Adjudicators and Officers access data in the various connected systems based on specific types of person centric queries. Originally, queries could be based on name and date of birth, A-number, or Receipt number. This new update expands the queries to allow person searches based on I-94 number, Visa Control number, and Social Security number. Regardless of the type of query—name or number based—the response will return a limited set of comparable information as described in previous PCQS PIAs from each of the queried systems. The initial return will include: Name (First and Last), Aliases, Date of Birth, and Alien Number. If the initially returned information is not sufficiently informative, a secondary, more detailed query is available and includes: Name (First, Middle, and Last), Aliases, Date of Birth, Alien Number, Country of Birth, Country of Citizenship, Immigration Status, Location, Arrival Information, Departure Information. The query returns are standard, although a given system may not have every data element, whether systematically or on a record-by-record case. Additional data fields will be available if the Adjudicator or Officer needs to access the system directly. If this returned information is sufficient for the Adjudicators and Officers to verify the individual, no further access is needed. If the returned information is not sufficient to verify the individual, the Adjudicators and Officers may access any additional information on the subject individual contained in each queried system. This layered access methodology provides the Adjudicators and Officers with only the amount of information needed for the specific case, thereby building in the Fair Information Practice Principles of data minimization of access and use limitation.

Connected Systems

As noted in the June 28, 2007 PIA, PCQS provides access to the following IT systems:

1. Alien's Change of Address System (AR-11);
2. Central Index System (CIS);



3. Citizenship and Immigration Services Consolidated Operational Repository (CISCOR);
4. Computer-Linked Application Information Management System 3.0 (CLAIMS 3);
5. Computer-Linked Application Information Management System 4.0 (CLAIMS 4);
6. Department of State Consular Consolidated Database (DoS CCD);
7. Microfilm Digitization Access System (MiDAS);
8. National File Tracking System (NFTS); and
9. Image Storage and Retrieval System (ISRS).

This update adds the following systems to the PCQS access capability:

10. U.S. Citizenship and Immigration Services (USCIS) Marriage Fraud Amendment System (MFAS) and
11. U.S. Citizenship and Immigration Services (USCIS) Reengineered Naturalization Applications Casework Systems (RNACS).

Each of these new systems is described below.

USCIS Marriage Fraud Amendment System (MFAS)

The Marriage Fraud Amendment System (MFAS) supports and maintains casework resulting from the Immigration Marriage Fraud Amendment Act (MFA), which became law on November 10, 1986. MFAS also provides office management with accurate aggregate and statistical information on casework operations. MFAS allows users the ability to process and control applications and petitions to grant Conditional Permanent Resident (CPR) status and Permanent Resident (PR) status, and to identify and terminate the CPR status of aliens who acquired this status fraudulently or who have not removed this status during the designated time period that the law requires.

Adjudicators and Officers will use MFAS as part of the adjudication processing of visa applications submitted by immigrant and non-immigrant visa petitioners. Information from MFAS is required by the Adjudicators and Officers to help determine the veracity of the petition information provided.

Visa Benefit Adjudicators, Visa Fraud Officers, and Consular Officers will have access to the following information from MFAS:

- Name
- Address
- Alien Number
- Spouse's Name
- Birth date
- Country of Citizenship
- Phone Number
- Examiner Interview Date
- Final Disposition
- Marriage Date
- Company Name
- Job Title
- Supervisor Name
- Supervisor Phone
- Naturalization Date

MFAS 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. The



SORN for MFAS is entitled DHS/USCIS 007 USCIS Benefits Information System SORN, published September 9, 2008 at 73 FR 56596.

USCIS 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 cases for examinations and oath ceremonies; and 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 a user's request. Officers and clerks in the citizenship branches of the district offices and sub-offices use RNACS.

Visa Benefit Adjudicators, Visa Fraud Officers, and Consular Officers will have access to the following information from RNACS:

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

Visa Benefit Adjudicators, Visa Fraud Officers, and Consular Officers will use RNACS as part of the adjudication processing of visa applications submitted by immigrant and non-immigrant visa petitioners when there is a question of immigration status. Information from RNACS is required by the Adjudicators and Officers to help determine the veracity of the petition information provided.

RNACS 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. The SORN for RNACS is entitled DHS/USCIS 007 USCIS Benefits Information System SORN, published September 9, 2008 at 73 FR 56596.

Privacy Risks

This new release of PCQS provides controlled access to two additional data sources or queries. Although any routine access to additional data sources is risk enhancing, PCQS mitigates this risk by limits the initial access it provides to data to only those data elements relevant to the query. In order to further mitigate privacy risks, and as required by the CA/USCIS MOU, the Bureau of Consular Affairs will train and brief its Adjudicators on the handling and protection of immigration data prior to their access. In addition, the PCQS queries are logged by the PCQ Service itself, and the logs are routinely viewed by USCIS operations and security staff to ensure that the service is not being misused.

As noted in the June 28, 2007 PIA, there are privacy risks associated with adding a new user to each of the connected systems, and where indicated above, adding additional purposes for the use of the information. The additional data sources have been added for specific purposes that met the original



collection purposes and met the needs of the Bureau of Consular Affairs to verify immigration status. Additional privacy risks are mitigated through the use of strong matching algorithms and presentation of all results in a single view. 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. For instance some of the data sources provide partially duplicative information from other data sources in order to ensure that the information is the most current and accurate. The duplicative information provides greater accuracy in that it shows matches in each data source -- and it also shows if there is not a match which indicates a need for further analysis. If the duplicative data does not match, it means that the two systems, which are supposed to be synchronized regularly, failed to synchronize for some technical reason (that is, one system may have one more action history record in the case history table than another system). A user can notice the data of one system has not been updated fully and make a decision by looking at the updated system, knowing that system is more complete than the first system.

Responsible Official

Harry Hopkins
Chief, IT Service Engineering Division
Office of Information Technology
United States Citizenship and Immigration Services
Department of Homeland Security

Approval Signature Page

Original signed and on file with the DHS Privacy Office

Hugo Teufel III
Chief Privacy Officer
Department of Homeland Security