



**Privacy Impact Assessment Update
for the**

**Computer Linked Application
Information Management System 4
(CLAIMS 4)**

DHS/USCIS/PIA-015(b)

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Abstract

The Department of Homeland Security (DHS) United States Citizenship and Immigration Services (USCIS) is updating the Privacy Impact Assessment (PIA) for the Computer Linked Application Information Management System 4 (CLAIMS 4) published on August 31, 2011.¹ CLAIMS 4 is an electronic case management system used to track and process naturalization applications. The purpose of this update is to discuss the centralization of naturalization forms after disposition of the Reengineered Naturalization Application Casework System (RNACS).

Introduction

The United States Citizenship and Immigration Services (USCIS) modified the administration and adjudication of naturalization and citizenship benefits by streamlining the process and centralizing the systems used to administer these forms. The Computer Linked Application Information Management System 4 (CLAIMS 4) replaces the Reengineered Naturalization Application Casework System (RNACS) and serves as the primary case management system for all naturalization applications. Individuals are instructed to file Forms N-600, *Application for Certificate of Citizenship*, N-600K, *Application for Citizenship and Issuance of Certificate Under Section 322*, and N-336, *Request for a Hearing on a Decision in Naturalization Proceedings (Under Section 336 of the INA)* at a secure Lockbox facility instead of the local office within their jurisdiction. This centralization effort streamlines the way forms are processed, accelerates the collection and deposit of fees, and improves the consistency of the administration and adjudication for these forms.

Centralization of Naturalization Forms

The former Immigration and Naturalization Service developed RNACS as an interim system to support naturalization processing in the period between the termination of the legacy Naturalization Application Casework System and the full deployment of CLAIMS 4. Today, the Lockbox receives and receipts incoming forms and electronically transmits those forms to CLAIMS 4 for processing instead of RNACS.² USCIS uses CLAIMS 4 to perform a variety of automated tasks associated with processing and adjudicating applications. Its functions include receipting, data entry, recording benefit determinations (e.g., approvals and denials), and other operations necessary to process naturalization applications. USCIS previously used RNACS to process these forms from initial data entry to issuance of final documents. The goal of this initiative is to process and adjudicate all the naturalization/citizen benefits in one central system.

¹ DHS/USCIS/PIA-015(a) - Computer Linked Application Information Management System (CLAIMS 4) Update is available at www.dhs.gov/privacy.

² For more information on the Lockbox, see DHS/USCIS/PIA-003(a) - Integrated Digitization Document Management Program (IDDMP), available at www.dhs.gov/privacy.



USCIS modified CLAIMS 4 to support the processing of the following naturalization applications:

- N-336, *Request for a Hearing on a Decision in Naturalization Proceedings (Under Section 336 of the INA)* (Office of Management Budget (OMB) No. 1615-0050), which is used by an individual to request a hearing on an unfavorable decision related to a naturalization application;
- N-600, *Application for Certificate of Citizenship* (OMB No. 1615-0057), which is used by an individual to document U.S. citizenship status based on parentage; and
- N-600K, *Application for Citizenship and Issuance of Certificate Under Section 322* (OMB No. 1615-0087), which is used for a child who regularly resides abroad to claim U.S. citizenship based on parentage.

USCIS instructs individuals applying for naturalization and citizenship benefits to mail completed applications, supplemental evidence, and applicable filing fees to the USCIS Lockbox. Each application undergoes a quality assurance review to ensure it is properly filed. Lockbox personnel verify the completion of the following items: basic biographical information, signature on the form, jurisdiction of the submitted form, correct fee, and basic eligibility of the individual.

Successfully completed filings are accepted and the information is entered into CLAIMS 4 rather than RNACS. CLAIMS 4 automatically generates an application identification number, which may be used later to check the application's status in CLAIMS 4. USCIS sends a receipt notice and appointment letter to the applicant indicating when and where the applicant must go to have his or her fingerprints taken after USCIS personnel enter information from the application into the system. USCIS continues to process naturalization and citizenship applications as outlined in the DHS/USCIS/PIA-015 CLAIMS 4 PIA.

CLAIMS 4 collects information pertaining to the applicant, biological parent, adoptive parent, and/or legal guardian to determine benefit eligibility. The information from these forms is similar to the type of data collected from the Form N-400, *Application for Naturalization*. This information may include: name, address, telephone numbers, birth information, Social Security Numbers (SSN), country of citizenship, applicant and family members' immigration status, marital status, personal characteristics, tax and financial history, employment information, medical information, military and selective service information, travel history, organization membership or affiliation history, and criminal history information (to the extent such history is revealed by the applicant in their application). New information entered into CLAIMS 4 includes adoption history. The processing of this information increases the volume of information collected by the system, but the information collected by these applications is similar to data currently collected by CLAIMS 4.



With the disposition of RNACS, USCIS migrated active cases from RNACS to CLAIMS 4 for continued processing. USCIS updated CLAIMS 4 to absorb RNACS responsibilities and functions. USCIS transferred historical data from RNACS to the enterprise Citizenship and Immigration Service Consolidated Operational Repository (eCISCOR)³ for archival purposes and continued access via the USCIS Enterprise Service Bus (ESB).⁴ Historical data are adjudicated and closed cases (i.e., approved or denied applications).

Reason for the PIA Update

USCIS is updating the CLAIMS 4 PIA to describe the impact of RNACS's disposition on CLAIMS 4. CLAIMS 4 now provides automated support for the processing of the following naturalization and citizenship applications: N-363, N-600, and N-600K. USCIS migrated all active cases from RNACS to CLAIMS 4 for continued processing and adjudication.

Privacy Impact Analysis

In each of the below sections consider how the system has changed and what impact it has on the below fair information principles. In some cases there may be no changes and indicate as such.

The System and the Information Collected and Stored within the System

USCIS updated CLAIMS 4 to administer and adjudicate naturalization and citizenship applications that were previously processed by RNACS. CLAIMS 4 is responsible for the case management functions for the following forms:

- N-336, *Request for a Hearing on Decision in Naturalization Proceedings* (OMB No. 1615-0050),
- N-600, *Application for Certificate of Citizenship* (OMB No. 1615-0057), and
- N-600K, *Application for Citizenship and Issuance of Certificate Under Section 322* (OMB No. 1615-0087).

CLAIMS 4 will continue to process the N-400. USCIS reviewed all the data elements that it collects on naturalization forms to ensure that only the minimum amount of information needed to determine benefit eligibility and to ensure that the information increased processing efficiency. Data that did not meet these guidelines were not included in the form. Furthermore, all data elements collected were negotiated with and approved by OMB during Paperwork Reduction Act (PRA) collection review.

³ DHS/USCIS/PIA-023 - Enterprise Citizenship and Immigrations Services Centralized Operational Repository (eCISCOR) is available at www.dhs.gov/privacy.

⁴ DHS/USCIS/PIA-008 - Enterprise Service Bus (ESB) is available at www.dhs.gov/privacy.



USCIS migrated all actives cases from RNACS to CLAIMS 4 for processing and adjudication. The information derived from these forms is similar to the type of data collected from N-400 forms. The processing of this information only increases the volume of information collected by CLAIMS 4. Although there is a privacy risk associated with increasing the volume of information in CLAIMS 4, this risk is mitigated by existing system protections, such as role-based access, mandatory annual Privacy Act and computer security awareness training, audit trails, and the implementation of appropriate IT security protocols.

Uses of the System and the Information

USCIS continues to use CLAIMS 4 as described in the DHS/USCIS/PIA-015 CLAIMS 4 PIA. USCIS modified CLAIMS 4 to support the processing of Forms N-600, N-600K, and N-336 to determine benefit eligibility. USCIS offices use CLAIMS 4 to administer and adjudicate benefits for naturalization throughout the naturalization process, from application submission to closeout. The modifications to CLAIMS 4 were limited to the intake and final adjudication of Forms N-600, N-600K, and N-336.

Retention

The retention has not changed with this update. The approved National Archives and Records Administration (NARA) retention schedule [N1-563-04-04] has not changed with this update and covers the collection of N-600, N-600K, and N-336. Information in the system from naturalization-based applications will be deleted 15 years after a final decision is made on the case (i.e., approved, denied, withdrawn, and any appeals process). USCIS consolidates these forms into the Alien File [N1-566-08-11]. There is no further privacy impact since retention remains the same.

Internal Sharing and Disclosure

Internal sharing and disclosure of information has not changed with this update. USCIS will continue to share information with agencies internal to DHS as outlined in the DHS/USCIS/PIA-015 CLAIMS 4 PIA and its corresponding updates.

External Sharing and Disclosure

The external sharing and disclosure of information has not changed with this update. USCIS will continue to share information with agencies external to DHS as outlined in the DHS/USCIS/PIA-015 CLAIMS 4 PIA and its corresponding updates.



Notice

USCIS provides notice through this PIA update. The DHS-USCIS-007 Benefits Information System (BIS) System of Records Notice (SORN), September 29, 2008, 73 FR 56596, covers the collection, use, and disclosure of data with these updates. Additionally, USCIS provides a Privacy Act Statement as required by Section (e)(3) of the Privacy Act to individuals who apply for naturalization benefits prior to the collection of information. The Privacy Act Statement details the authority to collect the information, purpose for which the information is used, how the information is going to be used outside of the agency, and whether providing the information is mandatory. USCIS provides the individual with the Privacy Act Statement on the Form Instructions for each Form.

Individual Access, Redress, and Correction

The individual right to access, redress, and correction has not changed with this update. Customers maintain the right to file a Freedom of Information Act (FOIA) and/or Privacy Act (PA) request to gain access to or amend their USCIS records. Any individual seeking to access information maintained in CLAIMS 4 should direct his or her request to USCIS National Records Center (NRC), P.O. Box 648010, Lee's Summit, MO 64064-8010. This update creates no increased privacy impact.

Technical Access and Security

The technical access and security controls for CLAIMS 4 has not changed with this update. USCIS continues to employ technical and security controls to preserve the confidentiality, integrity, and availability of the system, which is validated during the security authorization process.⁵ These security controls mitigate privacy risks associated with unauthorized access and disclosure.

⁵ The security authorization process substantiates the implementation of security standards and guidelines for information systems.



Technology

USCIS modified CLAIMS 4 to support the administration and adjudication of three additional naturalization forms in order to centralize the processing of naturalization applications. CLAIMS 4 continues to serve as the case management system to process naturalization and citizenship benefits. The centralization of these forms provides applicants with faster and more efficient application processing and consistent adjudication. Although technology modifications may create privacy risk, USCIS mitigates this risk by implementing appropriate controls to maintain compliance with the Federal Information Security Management Act.

Responsible Official

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Approval Signature

[Original signed copy on file with the DHS Privacy Office]

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