



**Privacy Impact Assessment Update
for the
Alien Change of Address Card
(AR-11)**

DHS/USCIS/PIA-018(a)

August 23, 2017

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Abstract

U.S. Citizenship and Immigration Services (USCIS) is updating this Privacy Impact Assessment (PIA) for the Alien Change of Address Card (AR-11).¹ USCIS is required to track address changes submitted in paper and electronic form. The purpose of this update is to discuss the additional USCIS Electronic Information System (USCIS ELIS) change of address method, the new AR-11 Data Input System (AR-11/DIS), the new system interconnection with Enterprise Citizenship and Immigrant Services Centralized Operational Repository (eCISCOR), and to clarify existing external sharing practices.

Overview

As set forth in Section 256 of the Immigration and Nationality Act (INA),² individuals who have a pending or recently approved application, petition, or request form are required to keep U.S. Citizenship and Immigration Services (USCIS) informed of their current mailing address. Such change of address reporting is compulsory to allow USCIS to deliver notifications to individuals who have filed an application, petition, or request under the INA. In addition, USCIS may need to contact applicants, petitioners, and requestors to provide other documents or return original copies of evidence submitted by the applicants, petitioners, and requestors. USCIS uses the Alien Change of Address Card (AR-11) Mainframe, a computerized system, to support the information management needs of USCIS in carrying out its mission.

USCIS offers three methods for applicants, petitioners, and requestors to report a change of address, to include:

1. Mail: Applicants, petitioners, and requestors complete Form AR-11, *Alien's Change of Address Card*, by paper and mail it to USCIS.³ Upon receipt, the information from the change of address card is manually transcribed into the AR-11 Data Input System (AR-11/DIS), which is a temporary data repository. The AR-11/DIS application consolidates the manually-entered change of address information and securely transmits a daily file to AR-11 Mainframe.

2. Online and Telephone: Applicants, petitioners, and requestors are able to electronically complete and submit Form AR-11 through the online Customer Relationship Interface System (CRIS) Change of Address (CoA) module.⁴ Applicants, petitioners, and requestors who call into the National Customer Service Center may also report a change of address.⁵ USCIS customer service representatives use the online CoA module to document the

¹ See DHS/USCIS/PIA-018 Alien Change of Address Card (AR-11), available at www.dhs.gov/privacy.

² 8 U.S.C. § 1305.

³ <https://www.uscis.gov/ar-11>.

⁴ See DHS/USCIS/PIA-019 Customer Relationship Interface System (CRIS), available at www.dhs.gov/privacy.

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



telephonically-reported address change. CRIS CoA securely sends information directly to AR-11 Mainframe via Secure File Transfer Protocol (SFTP).⁶

USCIS Electronic Information System (USCIS ELIS): Applicants, petitioners, and requestors who currently have a USCIS ELIS online account may submit their address changes in USCIS ELIS.⁷ The change of address information is automatically updated in USCIS ELIS. This process will not, however, automatically update AR-11 Mainframe and does not satisfy the legal change of address requirements for a customer. Applicants, petitioners, and requestors are still required to either submit a paper⁸ or electronic⁹ Form AR-11 to USCIS in order to legally update their address.

Change of Address IT Systems

USCIS uses three independent systems to collect change of address information from individuals, each of which corresponds to one of the three methods applicants, petitioners, and requestors can utilize to report the change. These systems include: (1) AR-11/DIS, which is a temporary repository for paper submissions; (2) CRIS CoA for telephone or electronic submissions; and (3) USCIS ELIS for applicants, petitioners, and requestors with USCIS ELIS online accounts.

The AR-11 Mainframe is primarily used to maintain and track address changes submitted to USCIS, and contains the addresses of those non-U.S. citizens who are currently in the United States and who have submitted an electronic or paper Form AR-11. The AR-11 Mainframe maintains a two-way interface with AR-11/DIS and CRIS CoA. Address changes made in USCIS ELIS only impact the filing submissions processed through USCIS ELIS, and so do not satisfy the INA requirement to keep addresses up to date.

Through a system interconnection, change of address records are replicated from the AR-11 Mainframe and stored in USCIS Enterprise Citizenship and Immigrant Services Centralized Operational Repository (eCISCOR).¹⁰ eCISCOR replicates and stores data from several USCIS systems. eCISCOR serves as an intermediary database for current read-only application systems that require access to immigration and naturalization data. eCISCOR supports workflow management, performance measurement, and information sharing requests from external users. The AR-11 Mainframe has a one-way connection with eCISCOR, meaning change of address information is only received and maintained by eCISCOR.

⁶ CRIS is a web based system accessible through the USCIS.gov website that provides customers with pending immigration benefits application, case status information, and estimated processing times.

⁷ See DHS/USCIS/PIA-056 USCIS Electronic Immigration System (USCIS ELIS), available at www.dhs.gov/privacy.

⁸ <https://www.uscis.gov/ar-11>

⁹ <https://egov.uscis.gov/coa/displayCOAForm.do>

¹⁰ See DHS/USCIS/PIA-023(a) eCISCOR, available at www.dhs.gov/privacy.



Information Sharing

The AR-11 Mainframe is an online query system primarily used by DHS employees and contractors. DHS offices in the United States and numerous foreign countries query the AR-11 Mainframe to obtain the most recent address information of an individual. USCIS grants query-only access to users with an operational need for the information, and subsequently users may not make changes to the information. U.S. Immigration and Customs Enforcement (ICE), U.S. Customs and Border Protection (CBP), and other government agencies are given access to the AR-11 Mainframe for investigations, enforcement, removal, and adjudicative functions. Additionally, external partner agencies, such as local law enforcement offices, Department of Justice (DOJ), and Department of Defense (DoD), may also receive change of address information through respective data interfaces. External users, such as the Department of State (DOS), may access AR-11 Mainframe data through the Person Centric Query System (PCQS).¹¹

Reason for the PIA Update

USCIS is updating the AR-11 PIA to include the following updates:

1. The new AR-11/DIS is used to electronically process alien change of address forms that are sent to USCIS, and to transmit the results to USCIS Headquarters (HQ). The Forms AR-11 that cannot be processed and returned to the applicant, petitioner, or requestor are also tracked in AR-11/DIS. USCIS may additionally return AR-11 forms for illegible handwriting, use of another language, not utilizing the proper Form AR-11, an incomplete name, date of birth, address, a missing signature or date, or listing multiple individuals on a single form. Furthermore, AR-11/DIS supports the ability to record, measure, and report on contractual performance requirements, reporting on data entry accuracy and document processing timeframes through the audit functionality.

Information from the original paper Form AR-11 is entered into AR-11/DIS. If the applicant submits a form that cannot be processed, USCIS will return the forms to the individual, along with any materials submitted, but were not required, to report the change of address (*e.g.*, funds, original birth certificates, pictures, or other attachments). The AR-11/DIS application consolidates the manually-entered change of address information, which is securely transferred to the AR-11 Mainframe.

2. New change of address method via USCIS ELIS. Applicants, petitioners, and requestors who currently have a USCIS ELIS online account may submit their address changes in USCIS ELIS. The change of address information is automatically updated in USCIS ELIS. This process will not automatically update the AR-11 Mainframe (or any other system

¹¹ See DHS/USCIS/PIA-010 Person Centric Query System (PCQS), available at www.dhs.gov/privacy.



outside of ELIS) and does not satisfy the change of address legal requirements for an applicant, petitioner, and requestor.

3. New system interconnection with eCISCOR. AR-11 Mainframe sends eCISCOR change of address information on a nightly basis.

4. Clarifying external sharing partners. Change of address information is shared with external sharing partners such as DOJ, DOS, and DoD.

USCIS will be revamping the change of address program and support information technology (IT) systems. As future change of address enhancements and components are developed, USCIS will consolidate the Change of Address PIA and updates to provide a holistic view on the collection, use, maintenance, and dissemination of information.

Privacy Impact Analysis

Authorities and Other Requirements

All non-U.S. citizens who are required to be registered are also required to keep the USCIS informed of their current address. Pursuant to Section 265 of the INA, USCIS applicants, petitioners, and requestors are required to report a change of address within 10 days of moving by submitting an electronic or paper Form AR-11 to USCIS.¹²

The change of address process receives System of Records Notice (SORN) coverage by the DHS/USCIS-007 Benefits Information System (BIS).¹³

AR-11 Mainframe was authorized to operate under the USCIS Mainframe Applications (USCIS Mainframe) Authority to Operate (ATO), on September 2, 2014. AR-11 Mainframe will enter into the Ongoing Authorization program upon completion of this PIA. Ongoing Authorization requires AR-11 Mainframe to be reviewed on a monthly basis and to maintain its security posture in order to retain its ATO.

The AR-11/DIS is covered as a minor system under the Digital Innovation and Development (DID-IT) accreditation boundary. DID-IT completed the security assessment and authorization documentation in August 2013 and accepted AR-11/DIS into the Ongoing Authorization program by September 2013.

NARA approved the retention schedule, N1-566-10-3 and NM-162-71, for the Form AR-11, AR-11 Mainframe, and AR-11/DIS.

¹² 8 U.S.C. 1305

¹³ DHS/USCIS-007 Benefits Information System, 81 FR 72069 (Oct. 19, 2016).



USCIS collects the change of address information directly from the applicant through a completed Form AR-11, which is subject to the requirements of the Paperwork Reduction Act (PRA). DHS obtained OMB approval and the Form AR-11 OMB Control Number is 1615-0007.

Characterization of the Information

There are no changes to the characterization of information outlined in DHS/USCIS/PIA-018 AR-11.

Uses of the Information

As required by Section 265 of the INA, 8 U.S.C. 1305, applicants, petitioners, and requestors are required to report a change of address so USCIS may maintain accurate contact information. USCIS uses the updated address to issue notification of a decision on that application, petition, or request. In addition, USCIS may need to contact applicants, petitioners, and requestors to provide other issued documents or return original copies of evidence.

USCIS provides read-only access to information contained in the AR-11 Mainframe to ICE and CBP for mission essential purposes. Such purposes include investigatory, deportation, and immigration court functions. Additionally, DOJ and DoD also have read-only accounts to AR-11 for verification, identification, and investigation of individuals. AR-11 Mainframe data is also used for statistical and recordkeeping purposes, and data may also be furnished to external federal, state, local, and foreign law enforcement officials for law enforcement purposes on an *ad hoc* basis.

Notice

USCIS is providing notice about these changes through this PIA update. The Benefits Information System SORN covers the collection, use, and maintenance of data with this update.¹⁴ Additionally, USCIS provides Privacy Notice on the Form AR-11 instructions that explains (1) the authority to collect the information; (2) the purpose for which the information is used; (3) how the information is going to be used outside of the agency; and (4) whether providing the information is mandatory.

Privacy Risk: There is a privacy risk that USCIS ELIS users are unaware that the change of address functionality does not satisfy the legal requirement for the applicant, petitioner, or requestor set forth in section 254 of the INA.

Mitigation: This risk is partially mitigated. Individuals who currently have a USCIS ELIS online account may submit their address changes in USCIS ELIS for correspondence purposes only.¹⁵ USCIS ELIS notifies individuals that they are also required to file a paper or electronic

¹⁴ DHS/USCIS-007 Benefits Information System, 81 FR 72069 (Oct. 19, 2016).

¹⁵ See DHS/USCIS/PIA-056 USCIS Electronic Immigration System (USCIS ELIS), *available at*



Form AR-11 to USCIS in order to legally update their address in the ELIS Frequently Asked Questions.¹⁶ USCIS found the clearance process to update the language directly on the USCIS ELIS customer interface to be costly and time-consuming. USCIS is currently focusing its resources to replace the customer interface for many e-filing methods, including change of address, with MyUSCIS.¹⁷ MyUSCIS is a separate online system that USCIS plans to deploy near the same date as notice would have been posted to the USCIS ELIS customer interface. In the interim, this PIA provides notice to file a separate Form AR-11 to satisfy section 254 of the INA.

Data Retention by the Project

NARA approved the retention schedule N1-566-10-3 for the electronic and paper-based Form AR-11 and respective AR-11 systems on December 14, 2010. This retention schedule states that paper forms should be destroyed within 180 days of the information being manually entered into AR-11/DIS, which is a temporary repository. Change of address information is maintained and disposed of in accordance with the approved NARA Retention Schedule. The schedule further states that the records retained in AR-11 Mainframe are destroyed five years after the date of receipt unless destroyed upon naturalization, departure, or the registrant's death. Records retained in AR-11/DIS are deleted after two years from the date of receipt.

Information Sharing

External access to the AR-11 Mainframe is governed by the Password Issuance and Control System (PICS), which is owned by U.S. Immigration and Customs Enforcement (ICE). PICS is a legacy mainframe system that provides a centralized system for issuing and authenticating user names and passwords. This centralizes the burden of account administration through a single system. PICS user accounts are used for user authentication across multiple systems throughout DHS. ICE manages access to AR-11 and provides access to non-ICE agencies, such as local law enforcement agencies, DOJ, and DoD. ICE plans to decommission PICS by the end of Fiscal Year 2017 and require DHS components to develop their own replacement solution. USCIS plans to use myAccess to control and monitor system access in order to limit external access to those with a need-to-know and as permitted by associated SORNs.

Additionally, external agencies (*i.e.*, DOS) may access change of address information through PCQS. PCQS does not store data. PCQS retrieves and temporarily displays information from connected systems in a consolidated read-only format for the user. PCQS is only available to authorized users who have been granted appropriate access privileges from connected systems.

www.dhs.gov/privacy.

¹⁶ <https://my.uscis.gov/helpcenter/article/how-do-i-update-my-mailing-address>

¹⁷ See DHS/USCIS/PIA-064 MyUSCIS, available at www.dhs.gov/privacy.



Redress

Individuals may file a Freedom of Information Act (FOIA) or Privacy Act (PA) request to gain access to their USCIS records. Only U.S. citizens or Lawful Permanent Residents may file a Privacy Act request to amend their USCIS records. Individuals may send Privacy Act or FOIA requests to USCIS National Records Center (NRC), P.O. Box 648010, Lee's Summit, MO 64064-8010. Persons not covered by the Privacy Act are also able to amend their records. If a person finds inaccurate information in his or her record received through FOIA, he or she may visit a local USCIS Field Office to identify and amend inaccurate records with evidence.

Individuals may also file a new Form AR-11 to report a change of address. Incorrect address information associated with other systems or specific applications, petitions, or benefits must be explicitly identified by the individual with requests that those other locations of incorrect data be corrected.

Auditing and Accountability

There is no change in the auditing and accountability as described in the DHS/USCIS/PIA-019 AR-11 PIA. USCIS continues to employ technical and security controls to preserve the confidentiality, integrity, and availability of the systems used to process change of address requests, which are validated during the security authorization process.¹⁸ These technical and security controls mitigate privacy risks associated with unauthorized access and disclosure.

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Approval Signature

Original signed and on file with the DHS Privacy Office.

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¹⁸ The security authorization process substantiates the implementation of security standards and guidelines for information systems.