



Privacy Impact Assessment
for the

Customer Scheduling and Services

DHS/USCIS/PIA-046

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Abstract

The Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) allows customers to schedule appointments with a USCIS Immigration Service Officer (ISO) to discuss the specifics of their benefit application and petition through the infopass.uscis.gov website and customer service kiosks. This PIA discusses the USCIS systems associated with scheduling and managing appointments and evaluates the privacy risks and mitigation strategies built into the systems. These systems include InfoPass and the Customer Management Information System (CMIS). USCIS is updating and reissuing this Privacy Impact Assessment (PIA), originally published on June 6, 2013, because CMIS may collect, use, and maintain not only Alien Number, but also USCIS Electronic Immigration System Numbers and Receipt Numbers. USCIS also removed references to a planned automated process for an individual to check in for his or her appointment at a USCIS field office through bar code scanners that was not implemented, and updated the system's Authority to Operate.

Overview

The Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) is responsible for the administration and adjudication of applications and petitions for all immigrant and non-immigrant benefits under the Immigration and Nationality Act.¹ While USCIS's core mission is to ensure the timely adjudication of benefits, a priority for USCIS is to streamline the processing of customer inquiries to improve the overall customer experience. USCIS enhanced and expanded various online customer-oriented services in an effort to promote transparency and accessibility to its operations.

USCIS receives and processes millions of benefit cases each year. Customers who apply for immigration-related benefits may have questions about immigration law, procedures, or specifics of their case that are best addressed by a trained Immigration Service Officer (ISO). Previously, these customers seeking assistance from USCIS had to wait in long lines for a first-come first-served in-person appointment. Generally, the number of customers seeking assistance exceeded the number of appointments available at their local field office. Many customers had to make an additional trip to the local field office due to the overwhelming demand of individuals seeking assistance and lack of available appointments.

USCIS Field Operations Directorate (FOD) developed an online appointment scheduling system known as InfoPass. With InfoPass, USCIS FOD allows customers to

¹ See 8 U.S.C. §§ 1101, 1103, 1201, 1255.



schedule their own appointments online to speak with an ISO at a local USCIS field office. InfoPass offers a convenient alternative to waiting in long lines at USCIS field offices and ensures customers receive same day service. InfoPass automates the process of scheduling an appointment with USCIS through the internet and allows USCIS to efficiently manage and streamline its appointment scheduling process.

InfoPass allows customers to schedule in-person appointments with USCIS field offices nationwide. USCIS provides customers the option to schedule an appointment through the infopass.uscis.gov website or at an InfoPass customer service kiosk. Each field office provides either a kiosk or computer to accommodate individuals without access to the internet to book an appointment. USCIS continues to assist walk-in customers, but those with a scheduled appointment receive priority. InfoPass users include:

1. Individual applicants and petitioners, and representatives: These users do not need user names or passwords to schedule or cancel an appointment. InfoPass only permits these individuals to schedule one appointment at a time.
2. Third Party Representatives (TPR): Individuals and entities, such as lawyers and Community Based Organizations (CBO); these users have registered user accounts with public permissions. USCIS no longer issues TPR accounts for business reasons. USCIS grandfathered in existing accounts and currently five accounts remain. TPRs were issued user names and passwords only when their request for an account was approved by USCIS. The registered user account allows TPRs to schedule multiple appointments. TPR are able to use InfoPass to schedule appointments for their clients as an individual user.

Appointment Creation

InfoPass guides 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 collects the following personally identifiable information (PII) from the customer to complete the appointment process:

- Full Name;
- Date of Birth;
- Telephone Number;
- Email Address;



- Alien Number (A-Number);
- Receipt Number;
- Country of Residence; and
- Purpose of Visit.

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; location; and personal identification number (PIN), which is a system-generated, random, five-digit code assigned to the appointment. As a security measure, the PIN is displayed only at the time the appointment is created and cannot be retrieved at any other time.

Customers can review and reprint a copy of their confirmation appointment notice from any computer that is connected to the internet by going to <http://infopass.uscis.gov> 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. However the 5-digit PIN number will not be included on this copy. The 5-digit PIN is required only if the customer needs to cancel the appointment for any reason.

Customers can also cancel their appointments through InfoPass by selecting the 'cancel' option. Customers must first cancel an existing appointment before they can schedule an appointment for another date and time. To cancel an appointment, InfoPass prompts the customer to provide the system-generated confirmation number and PIN printed on the original appointment confirmation notice to identify the confirmed appointment. Without the PIN and/or confirmation number, the customer will not be able to cancel their appointment and will not be able to make another appointment until the scheduled appointment date and time has passed. The customer then follows step-by-step instructions to complete the appointment cancellation process.

This PIA replaces the Customer Scheduling and Services PIA published on June 6, 2013.



Appointment Management

Upon arrival at a USCIS field office, a customer checks in for an appointment at the front counter of the office. The customer presents the printed confirmation appointment notice and a photo identification document to the Reception Desk Officer operating the counter. The Reception Desk Officer enters the confirmation number from the appointment confirmation notice into InfoPass, which displays the information about the customer and appointment. If the appointment confirmation notice is not available, the Reception Desk Officer manually searches the day's appointments for a name and date of birth match. If there is not a match, the Reception Desk Officer treats the customer as a walk-in.

USCIS uses Customer Management Information System (CMIS) to issue all customers (both walk-ins and those with scheduled appointments) a queuing ticket while the customer is checking into his or her appointment. CMIS is a queuing system that prioritizes customers to ensure they receive service in a timely and efficient manner, and allows USCIS personnel to better track incoming customers chronologically. CMIS handles individual appointments, reception registration, customer routing, and monitoring customer flow through the field offices. Each issued ticket is sequentially numbered to organize the queue flow of incoming customers and is assigned by arrival time. To generate a queuing ticket, the following information is entered into CMIS: (1) confirmation number; (2) A-Number, USCIS Electronic Immigration System (USCIS ELIS) Number, or Receipt Number; (3) appointment type; (4) appointment time; (5) zip code; and (6) number in the party. A CMIS-generated queuing ticket places the individual in a virtual line. The printed ticket includes the ticket number, the service category, and the time the ticket printed. Once a ticket is issued, USCIS directs the customer to the waiting area to be called for assistance.

The Immigration Service Officer (ISO) also uses CMIS to identify the next customer in the queue. The ISO uses the A-Number, USCIS ELIS Number, or Receipt Number to index and retrieve notes recorded into CMIS during an applicant's prior visits, and to retrieve the individual's Alien File (A-File) and relevant case information prior to the appointment to better assist the customer with his or her specific inquiry. The ISO who completes the appointment makes appropriate notes within CMIS about the questions the customer asked and the responses given, and closes the ticket number at the end of the appointment. This information is used to better assist customers during future visits. USCIS time stamps each interaction from the moment the customer reports to the reception desk until the visit ends; e.g., waiting time, time spent with the agent. The ISO records all services provided to the customer in the visit in CMIS. USCIS does not use notes related to customer questions and inquires to make adjudicative benefit decisions.



Reporting

USCIS field offices use InfoPass and CMIS to manage and track the flow of incoming appointments. Authorized USCIS personnel are able to use InfoPass and CMIS to run a variety of customizable reports to monitor employee workload and office productivity in order to determine if resources are properly allocated. These reports can be run on a broad spectrum to measure productivity trends and average processing times. InfoPass and CMIS can also generate granular level reports to identify types, number, and status of appointments located in a particular office or assigned to a particular ISO.

Customer Satisfaction Assessments

USCIS Customer Services and Public Engagement Directorate (CSPED) conducts customer satisfaction assessments through electronic surveys (e-surveys) and focus groups to collect data from customers about their experiences and the level of satisfaction with the services received on the InfoPass appointment scheduling system and USCIS local offices. InfoPass and CMIS are used to improve customer services and enhance operational efficiency. A customer satisfaction assessment is an important tool in evaluating the level of satisfaction of all customers when using the InfoPass appointment system and obtaining USCIS local office services. Results from these assessments are used by USCIS to change and modify different aspects about InfoPass and office services in order to improve customer satisfaction.

1. E-Surveys

USCIS extracts appointment and customer-related information from InfoPass to contact customers about e-surveys. Information extracted from InfoPass includes email address, location of appointment, and date of appointment. USCIS only emails e-surveys to customers who provided an email address. USCIS provides notice to the customer that the agency may use his or her email address to send follow up invitations to participate in voluntary e-surveys through the InfoPass Privacy Act Statement.² The survey is made available via a web link in the e-mail invitation and only solicits opinion-based responses from customers about their experience with InfoPass, their appointment, and service provided by USCIS employees. The e-survey is not mandatory and is conducted anonymously. In the e-mail invitations to the survey, customers are provided a notice with the purpose of the survey, instructions on how to complete the survey, and how to opt-out of future surveys. Four days after the initial invitation, an email reminder is sent to those individuals who have not yet responded. This is the last email these customers receive regarding the e-survey.

² See Appendix A of this PIA to view the InfoPass Privacy Act Statement.



2. Focus Groups

USCIS also conducts customer focus groups at various professional focus group facilities. To recruit respondents for the focus groups, USCIS randomly selects e-mail addresses of InfoPass customers whose local office matches the geographic location where the focus group is to be conducted. USCIS provides notice to the customer that the agency may use his or her email address to send follow up invitations to participate in voluntary focus groups through the InfoPass Privacy Act statement.³ The contractor uses the e-mail addresses to send email invitations to customers. In the e-mail invitations to the focus group, customers are provided a notice with the purpose of the focus group, instructions on how to register, and how to opt-out of future surveys. Customers who are interested in participating in the focus group sessions respond to the request either by email or by telephone. When scheduling focus group meetings, the survey contractor collects the customer's first name and phone number to confirm participation of the customer in the focus group meeting. After the customer confirms participation, USCIS contacts the participant prior to the focus group session by e-mail or telephone to confirm participation.

Individuals who opted to participate in a focus group session are advised that the information is used to determine customer perceptions regarding the services received by InfoPass and the USCIS office and responses are anonymous. Responses to focus group questions from individuals are collected and retained through transcription services. These transcription documents do not include customer names or any other identifying information. USCIS CSPE generates customer satisfaction reports from the response. The responses are anonymous and aggregated and will not be tied to specific individuals. Once the focus group has been conducted, the survey contractor deletes all email addresses and telephone numbers associated with this specific focus group within 120 days of contact.

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.

³ See Appendix A of this PIA to view the InfoPass Privacy Act Statement.



1.2 What Privacy Act System of Records Notice(s) (SORN(s)) apply to the information?

The customer information in InfoPass, CMIS, and for the customer satisfaction assessments is covered by the DHS/USCIS-007 Benefit Information System (BIS) System of Records Notice (SORN).⁴ The customer responses from the customer satisfaction assessments are anonymous and do not require SORN coverage because they are not linked to an individual and are not uniquely retrievable. The employee information in InfoPass and CMIS is covered by the DHS/ALL-004 - General Information Technology Access Account Records System (GITAARS) SORN.⁵

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

InfoPass was approved for operation on January 2, 2014 for a period of 18 months, unless a significant change to the information system requires an earlier accreditation. The InfoPass Authority to Operate (ATO) is set to expire on July 2, 2015. The InfoPass Security Plan (SP) was completed on December 12, 2013.

CMIS was approved for operation on January 2, 2014 for a period of 12 months. The CMIS Authority to Operate (ATO) is set to expire on January 2, 2015. The CMIS Security Plan (SP) was completed on November 16, 2013.

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

NARA approved the CMIS Retention Schedule [N1-566-08-08]. This schedule covers both InfoPass is and CMIS records.

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.

InfoPass is subject to the PRA requirements. OMB approved this collection under OMB Control Numbers 1615-0113. OMB also approved the collection of customer satisfaction data under OMB Control Number 1615-0121.

⁴ DHS/USCIS-007 Benefit Information System, 73 FR 56596 (Sept. 28, 2008).

⁵ DHS/ALL-004 - General Information Technology Access Account Records System, 77 FR 70792 (Nov. 27, 2012).



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.

Appointment Scheduling

InfoPass collects the following customer information to create an appointment: full name, zip code, date of birth, telephone number, email address, A-Number, Receipt Number, country of residence, and purpose of visit. The name, date of birth, zip code, and telephone number are the only fields required to schedule an appointment.

InfoPass generates and maintains an appointment confirmation notice with appointment details. The appointment confirmation notice contains the customer's name, appointment type, confirmation number, confirmation code, appointment date, appointment time, location, and PIN. Customers use the system-generated confirmation number and PIN to cancel an appointment with InfoPass.

Customer Queue Flow

To generate a queuing ticket, the following information from InfoPass is entered into CMIS: (1) confirmation number; (2) A-Number, USCIS ELIS Number, or Receipt Number; (3) appointment type; (4) appointment time; (5) zip code; and (6) number in the party. CMIS generates a ticket number for each customer that places the individual in a virtual line. The printed CMIS ticket includes the ticket number, the service request category, and the time the ticket was printed. The information associated with a ticket, such as the A-Number, Receipt Number, and USCIS ELIS Number, is used to index records of past visits to USCIS Field Offices and by the ISO to retrieve the case information for the customer.

Employee Information

InfoPass and CMIS collect USCIS employee user names and passwords to facilitate log-in access to the system and for auditing purposes. CMIS employee PII includes the name of the ISO assigned to the appointment.

Customer Satisfaction Assessments

USCIS collects and uses email addresses from InfoPass users to email an e-survey or invitation for participation in a USCIS-sponsored focus group session. Results from the assessments are not stored in InfoPass.



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

USCIS collects information directly from the individual or his or her representative to schedule an appointment with USCIS through InfoPass. Customers may access InfoPass via the infopass.uscis.dhs.gov webpage or a kiosk located at a USCIS office.

CMIS information is collected from individuals, automatically generated during appointment check-in, and recorded by USCIS personnel to document the services provided during a visit.

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. USCIS does not use commercial or publicly available data to schedule appointments and place incoming customers in queue.

2.4 Discuss how accuracy of the data is ensured.

InfoPass collects information directly from the individual or his or her representative; therefore, USCIS is dependent upon the accuracy of the information provided by the customer.

InfoPass does not support customer access and alteration of information in the system. If a customer determines information on the appointment confirmation notice is inaccurate, he or she may cancel the appointment. Upon cancelling the appointment, USCIS deletes all data associated with the appointment request. The customer may then create a new appointment that includes the correct information. When a customer cancels his or her appointment, USCIS deletes the data collected to create that appointment. InfoPass generates a new PIN and confirmation number when the customer schedules a new appointment.

USCIS instructs customers to present their printed confirmation appointment notice and a photo identification document at the time of the appointment. USCIS employees manually enter the confirmation number into InfoPass, which displays the information about the customer and appointment. If the appointment confirmation notice is not available, the ISO manning the front counter manually searches the day's appointments for a name and date of birth match. If there is a match, the customer is issued a CMIS ticket and waits to be called. If there is not a match, the customer will be treated as a walk-in customer.



2.5 Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: There is a risk that USCIS will collect more information than is necessary.

Mitigation: USCIS mitigates this risk by conducting an analysis in conjunction with the USCIS Privacy Office to determine which data elements are relevant and necessary to (1) schedule an appointment, (2) identify the person making the appointment, (3) maintain a history of his or her visits to a USCIS field office, (4) locate his or her file or application, and (5) conduct customer service assessments.

Privacy Risk: There is a risk that USCIS will maintain inaccurate data.

Mitigation: USCIS mitigates the risk of maintaining inaccurate data by collecting information directly from the individual or his or her representative. If an individual with a scheduled appointment notices inaccurate data on his or her confirmation letter, the individual may correct his or her information by cancelling his or her appointment and creating a new appointment with the accurate information. When an individual cancels his or her appointment, InfoPass deletes the collected data. If the individual does not notice, or is otherwise unaware that the information is inaccurate, the individual and USCIS have the opportunity to correct the data when the individual meets with the ISO at his or her InfoPass appointment. When an individual makes an InfoPass appointment, USCIS requests that the individual bring the InfoPass appointment notice confirmation and a government-issued identification. This allows the ISO to verify the individual's identity. Once the ISO verifies the individual's identity, the ISO is able to correct inaccurate information.

USCIS instructs the customer to bring and present his or her printed confirmation appointment notice and a photo identification document. USCIS employees manually enter the confirmation number into InfoPass, which displays the information about the customer and appointment. If the appointment confirmation notice is not available, the clerk manually searches the day's appointments for a name and date of birth match. If there is a match, the customer receives a CMIS ticket and waits to be called. If there is not a match, the customer will be treated as a walk-in.



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.

USCIS uses the information collected by InfoPass and CMIS to schedule and effectively manage appointments made by the customer, queue customers, and conduct a customer satisfaction assessment through the coordination of an e-survey or focus group. Specific uses of the information are as follows:

- Name and date of birth are used to identify the individual when he or she arrives for the appointment;
- Zip code is used to locate the field office closest to the individual scheduling the appointment;
- A-Number, USCIS ELIS Number, and Receipt Number are used to verify the identity of the individual, retrieve associated case data, and update information if there are any discrepancies at the scheduled appointment;
- Email addresses are used to contact the customer for Customer Satisfaction Assessments;
- Email address or phone number is used to contact the applicant in the event of a scheduling issue involving the appointment time;
- Confirmation number and PIN are used by the customer to cancel an appointment. If an appointment is canceled, InfoPass deletes the appointment and individual information associated with the confirmation number and PIN; and
- Results from customer satisfaction assessments are used by USCIS to change and modify different aspects about InfoPass and office services in order to improve customer satisfaction.

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. InfoPass and CMIS do not use technology to conduct electronic searches, queries, or analyses.



3.3 Are there other components with assigned roles and responsibilities within the system?

Access to InfoPass and CMIS is limited to USCIS authorized personnel. There is no intra-departmental sharing of this information.

3.4 Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: There is a risk that InfoPass will collect and use information in a manner inconsistent with USCIS' authority and mission.

Mitigation: Part of USCIS's mission is to provide effective customer-oriented immigration benefit and information services. USCIS created InfoPass to help fulfill this goal. USCIS mitigates the risk of collecting and using information in a manner inconsistent with USCIS's authority and mission by minimizing the amount of information collected and by limiting the purposes for which USCIS may use the information collected when creating an InfoPass appointment. As described in the Privacy Act Statement on the InfoPass website, the primary purpose for collecting the information is to allow USCIS to schedule the appointment.

USCIS also uses the information collected to identify the person making the appointment, to maintain a history of his or her visits to a USCIS field office, to locate his or her file or application, and to conduct customer service assessments. In addition, USCIS requires that all InfoPass and CMIS users receive training on the appropriate use of the information and system prior to being approved for access.

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 completely voluntary and by ensuring that USCIS only receives results that are not associated with an individual. USCIS contracts an outside vendor to conduct the customer satisfaction survey and any focus groups. In the e-mail invitation to the survey or focus group, the vendor provides the individual with a notice with the purpose of the survey or focus group, instructions on how to complete the survey or focus group, and how to opt-out of future invitations. USCIS and the vendor conducting the survey or focus group do not request PII from the individual during the customer satisfaction survey or focus group and do not link the responses back to the customer's other records.



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 and DHS/USCIS-007 BIS SORN. Additionally, USCIS 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.⁶

USCIS also contacts the individual by email to request participation in an e-survey or focus group and advises the individual that participation is voluntary. In the e-mail invitation, customers are provided a notice with the purpose of the customer satisfaction assessment, instructions on how to participate, and how to opt-out of future requests.

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 the information is voluntary. A customer can choose to decline to provide information; however, that may prevent the customer from scheduling an appointment through InfoPass. Once the customer provides the information, he or she does not have the ability to consent for specific uses. Providing information is giving implied consent for all uses specified in the SORN.

4.3 Privacy Impact Analysis: Related to Notice

Privacy Risk: There is a risk that individuals are not aware of the collection and use of their PII.

Mitigation: USCIS mitigates this risk by providing several forms of notice. On the InfoPass website, prior to collecting information, USCIS displays a link to the

⁶ Please see Appendix A to view the InfoPass Privacy Act Statement.



Privacy Act Statement applicable to InfoPass. The Privacy Act Statement states that providing information is voluntary, but failure to provide certain requested information may prevent the customer from scheduling an appointment through InfoPass. Additionally, when the individual schedules his or her appointment, InfoPass provides step-by-step instructions that briefly explain why USCIS collects the information and how the agency uses the information. USCIS also provides notice through this PIA and the BIS SORN.

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.

InfoPass retains PII to identify individuals scheduling an appointment for 60 days after the date of the appointment, with the exception of the full name, phone number, and email address data used to contact the customer in order to conduct customer service assessments. Information used to conduct customer quality assessments is purged after 120 days. USCIS destroys CMIS data when no longer needed for agency business.

5.2 Privacy Impact Analysis: Related to Retention

Privacy Risk: There is a risk that PII is retained longer than necessary to fulfill specified purposes.

Mitigation: The CMIS data retention periods identified in the approved NARA schedule limit the retention of data for only as long as necessary to support USCIS's mission. The schedule complies with the requirements of the Federal Records Act and the stated purpose and mission of the systems.

InfoPass and CMIS records are not used to make benefits decisions. Instead, USCIS uses InfoPass and CMIS records to schedule and facilitate InfoPass appointments. The information in InfoPass is purged on a weekly basis to ensure that PII is not retained beyond the 60-day retention schedule. The only exception currently permitted on the retention of any PII older than 60 days is for the data used to conduct the Customer Satisfaction Assessments. This data is deleted within 120 days of receipt. Details about appointments are retained for as long as a business use requires the data. The details include name of the ISO conducting the interview, the date, and the times the interview started and ended.



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.

USCIS does not share appointment records from InfoPass or queue information from CMIS with external entities in the normal course of business.

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

USCIS does not share appointment records from InfoPass or queue information from CMIS with external entities in the normal course of business. USCIS will ensure any instances of sharing are fully consistent with the routine uses outlined in the DHS/USCIS-007 BIS SORN.

6.3 Does the project place limitations on re-dissemination?

USCIS does not share appointment records from InfoPass or queue information from CMIS with external entities in the normal course of business. USCIS will ensure any instances of sharing are fully consistent with the DHS/USCIS-007 BIS SORN.

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

USCIS does not share appointment records from InfoPass or queue information from CMIS with external entities in the normal course of business. USCIS will maintain a record of any disclosures made pursuant to a routine use.

6.5 Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk of unauthorized sharing of information.

Mitigation: USCIS mitigates this risk by implementing strong oversight procedures. Currently, USCIS does not routinely share appointment records from InfoPass or queue information from CMIS with external agencies. USCIS has formal review and approval process in place for new sharing initiatives. Any new use of information and/or new access requests for the system must be approved by the proper review authorities. USCIS reviews any updates related to information sharing with



external entities prior to disclosure to ensure any instances of sharing are fully consistent with the DHS/USCIS-007 BIS SORN. USCIS has an approval process in place for new sharing agreements.

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?

InfoPass allows the customers and their representatives to access their scheduled appointments through the online interface. InfoPass allows the individual or his or her representative to cancel an appointment and then schedule another appointment using the correct information if inaccurate information was provided. USCIS deletes all InfoPass PII 120 days after a customer's scheduled appointment. Customers seeking access to their scheduled appointment information may access it any time prior to the date and time of their scheduled appointment.

CMIS is a customer queuing and information gathering system that manages the flow of customers who visit field offices. CMIS gathers limited customer PII and statistical information about the services the customer received while in the office, such as time spent waiting, time spent with an ISO / adjudicator and types of services offered. USCIS maintains appointment history data in CMIS until the information is no longer needed. Customers seeking access to their appointment history may request access to it at any time.

An individual may gain access to his or her USCIS records by filing a Freedom of Information Act (FOIA) or Privacy Act request. Any individual seeking access to his or her USCIS record may submit the aforementioned requests to the following address:

U.S. Citizenship and Immigration Services
National Records Center
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 request should state clearly the information that is being requested. The procedures for making a request for access to one's records can 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?

InfoPass customers and their representatives have the ability to correct information by cancelling the scheduled appointment and then scheduling another appointment using the correct information. The customer must first cancel the appointment, and then reschedule the appointment with the correct information. Customer and appointment data is deleted from InfoPass when an appointment is cancelled.

Individuals will not have the ability to correct appointment information after the appointment date has passed, and all records are deleted 60 days after the scheduled appointment date in InfoPass and CMIS. Individuals are able to correct potentially inaccurate data that they submitted during the appointment with an ISO. The only exception currently permitted on the retention of any PII older than 60 days is for the data used to conduct the Customer Satisfaction Assessments. This data is deleted within 120 days of contact.

7.3 How does the project notify individuals about the procedures for correcting their information?

The procedures for individuals to correct their information are outlined in this PIA, the SORN associated with this system and while creating an InfoPass appointment. After the appointment is completed, InfoPass does not provide means to make change appointment and queuing data.

7.4 Privacy Impact Analysis: Related to Redress

Privacy Risk: There is a risk that individuals will not have the ability to correct their record.

Mitigation: The redress and access measures offered by USCIS are commensurate with the purpose of the system. USCIS notifies individuals about procedures to correct their information in this PIA, the SORN associated with this system, and while creating an InfoPass appointment. InfoPass allows the individual or his or her representative to cancel an appointment and then schedule another appointment using the correct information if inaccurate information was provided. The cancellation of an appointment deletes all biographic and appointment information including the system-generated data, such as the confirmation number.

Additionally, individuals may request access to information about themselves under the FOIA and Privacy Act; however, USCIS deletes most PII collected during the



InfoPass appointment creation process 60 days after the scheduled appointment and is therefore not available for access and amendment after deletion.

Responses from customer satisfaction assessments are anonymous, aggregated, and not tied to specific individuals. Therefore, customer satisfaction assessments are not available for access and amendment after submission.

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?

InfoPass has an audit trail capability that monitors user activities and generates alerts for unauthorized access attempts. The general audit log and the security log allows the Global Administrator to select event type such as access or logon and the data displayed includes timestamp, name, IP, transaction, and site. The autolock log displays the person's name, last login, autolock date with time, reinstate date with time, username, and site. This auditing influences users to use the system appropriately.

InfoPass limits the number of employees with access to PII to those who need the information to perform their duties, and will utilize software to perform network level auditing of the application. With the exception of district, region, and global administrators, users are limited to access data for only their specific location. InfoPass deletes PII after 60 days unless the information is used for customer satisfaction assessments. PII used for customer satisfaction assessments is deleted within 120 days.

USCIS and DHS trusted internet connection use a commercial off-the-shelf solution to protect InfoPass from USCIS and internet connections. This network level protection includes connection auditing, detection, and prevention of suspect or malicious connections in order to limit or prevent malicious use of InfoPass. These products include firewalls, routers, and load balancer/application firewalls that forward system event messages to a central logging facility. The central logging facility has the ability to detect known probe or attack signatures.

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

All 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?

InfoPass and CMIS employ role-based access controls so only employee users with a need-to-know have access to the information in the system. InfoPass and CMIS provide a warning banner at all access points to deter unauthorized use of information by external and internal users. The banner warns authorized and unauthorized users about the appropriate uses of the system, that the system may be monitored for improper use and illicit activity, and the penalties for non-compliance.

External users are customers and their representatives who seek to schedule an appointment with a USCIS field office. InfoPass is publically available to customers through infopass.uscis.gov for the purpose of scheduling and cancelling an appointment. A customer may only schedule one appointment using his or her PII.

Internal access is limited to registered employee users. Registered users must be granted access and be issued a user name and password prior to gaining access to the system. Internal access to information is on a need-to-know basis. This need-to-know is determined by the users and their respective responsibilities. Moreover, access privileges, for both internal and external users, is limited by establishing role-based user accounts to minimize access to information that is not needed for appointment management. InfoPass has the capability of identifying and deactivating unused accounts.



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?

InfoPass and CMIS do not have any information sharing agreements with an organization within or outside of DHS. However, USCIS has formal review and approval process in place for new sharing agreements. Any new use of information and/or new access requests for the system must go through the USCIS change control process and must be approved by the proper authorities.

Responsible Officials

Donald Hawkins
Privacy Officer
U.S. Citizenship and Immigration Services

Approval Signature

Original signed and on file with the DHS Privacy Office

Karen L. Neuman
Chief Privacy Officer
Department of Homeland Security