



Privacy Impact Assessment Update  
for the

# **Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems**

**DHS/USCIS/PIA-016(a)**

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## Abstract

U.S. Citizenship and Immigration Services (USCIS) oversees lawful immigration to the United States and is responsible for processing petitions, applications, and other requests for immigration benefits. USCIS uses the Computer Linked Application Information Management System (CLAIMS 3) and associated systems to manage the adjudication process for most domestically-filed, paper-based, immigration benefit filings with the exception of naturalization, intercountry adoption, and certain requests for asylum and refugee status. USCIS is updating this Privacy Impact Assessment (PIA) to evaluate the privacy risks and mitigations associated with the collection, use, and maintenance of personally identifiable information (PII) provided by individuals seeking requested immigration related benefits.

## Overview

U.S. Citizenship and Immigration Services (USCIS) receives and adjudicates petitions, applications, and other requests (hereinafter referred to as “benefit requests”) for many United States immigration benefits. This PIA covers the adjudication process and USCIS case management systems for most domestically-filed, paper-based, immigration benefit filings with the exception of naturalization, intercountry adoption, and certain requests<sup>1</sup> for asylum and refugee status. USCIS uses different data systems to capture and store information provided by benefit requestors, including the Computer Linked Application Information Management System (CLAIMS 3), the Interim Case Management System (ICMS), and Marriage Fraud Amendment System (MFAS), collectively referred to as “CLAIMS 3 and associated systems.”

USCIS processes different benefit requests using different case management systems, sub-systems, tracking tools, and data aggregation tools for reporting. This process creates duplicate records and data integrity concerns. USCIS is slowly transitioning benefit request processing to the USCIS Electronic Immigration System (USCIS ELIS), which will alleviate some of these data integrity and data minimization risks.

At a very high level, CLAIMS 3 and associated systems are old, legacy, mainframe systems that do not have the capability to interface in real-time with other systems or to generate reports, metrics, or aggregated statistics. But CLAIMS 3 still serves as the authoritative source case management system for certain benefit requests because so many other tools and systems point to it.

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<sup>1</sup> The “certain requests” for refugee and asylum benefits include the “follow to join” petition (Form I-730). “Follow to join” is an option offered to family members of the principal beneficiaries of approved asylum and refugee status. Immediate family members (spouses and children under the age of 21) may qualify for derivative status. An individual who entered the United States and was granted asylum/refugee status within the past two years may petition to have his or her spouse and/or unmarried children “follow-to-join” him or her in the United States and obtain derivative status. The derivatives may be in the United States or outside the United States.



Data from CLAIMS 3 is replicated across many systems and tools within USCIS due to the technical limitations of CLAIMS 3 itself. Therefore, this PIA focuses on documenting all of the tools and interfaces that rely on CLAIMS 3. As detailed throughout this PIA, this business process has generated data integrity and data minimization concerns.

The three case management systems used to track and process paper-based benefit request forms other than naturalization, intercountry adoption, and certain asylum and refugee benefits include:

- **CLAIMS 3** is the case management system that supports and maintains officer casework documentation and tracking for most benefit requests. CLAIMS 3 functionalities include tracking the adjudication performed by USCIS personnel, archiving, card production, case history, case transfer, on-demand reports, electronic file tracking, image capture, production statistics, and status update and electronic ingestion of benefit request form data captured through the Lockbox.<sup>2</sup>
- **ICMS** is a web-based front-end to CLAIMS 3. ICMS can be used to review, modify, and track the adjudication performed by USCIS personnel of benefit request forms.
- **Marriage Fraud Amendment System (MFAS)** is a legacy mainframe case tracking system designed to supplement the adjudication of petitions covered by the Immigration Marriage Fraud Act of 1986 (IMFA).<sup>3</sup> Contrary to the name of the system, MFAS supports and maintains casework for petitions for Legal Permanent Residency by aliens who have previously been granted Conditional Permanent Residency under the terms of the IMFA, including entrepreneurs. MFAS facilitates the adjudication and notification process for this program.

When a petition to remove the terms of conditional permanent residency is received, USCIS accepts the fee and issues a receipt in CLAIMS 3, which then interfaces with MFAS to update the case with the information that a petition has been received. When a final decision on the case is made in MFAS and a notice is issued, the CLAIMS 3 history data for the case is updated to reflect the decision. Once the case has been receipted in CLAIMS 3 and MFAS has been updated with the receipt information, the case is locked in CLAIMS 3 and can be updated only in MFAS.

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<sup>2</sup> In general, a Lockbox is a post office box used by USCIS to accelerate the collection of receivables. The USCIS Lockbox is used to accept applications and petitions by electronically capturing data and images from benefit request forms and by performing fee receipting and fee deposit. See DHS/USCIS/PIA-061 USCIS Benefit Intake and Receipt Intake, *available at* [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

<sup>3</sup> See Public Law 99-639, which was passed in order to deter immigration-related marriage fraud. Its major provision stipulates that aliens deriving their immigrant status based on a marriage of less than two years are conditional immigrants. To remove their conditional status, the immigrants must apply at an USCIS Office during the 90-day period before their second-year anniversary of receiving conditional status. If the aliens cannot show that the marriage through which the status was obtained was and is a valid one, their conditional immigrant status may be terminated and they may become deportable.



All information maintained by CLAIMS 3 and associated systems is also replicated in the Enterprise Citizenship and Immigrations Services Centralized Operational Repository (eCISCOR) for reporting, statistical analysis, and adjudicatory purposes<sup>4</sup> that CLAIMS 3 and associated systems are unable to perform.

Using a data repository such as eCISCOR protects CLAIMS 3 and associated systems from undue resource strain. eCISCOR transfers data from nearly all USCIS live transactional systems. Due to the age of many legacy USCIS live transactional systems, and the high volume of cases they process, USCIS requires eCISCOR (and other backend storage systems) to reduce the labor and system strain involved in accessing, reporting, and sharing information between USCIS systems.

### ***Preliminary Review of Application:***

As described in the Benefit Request Intake Process PIA, when a benefit requestor,<sup>5</sup> accredited representative,<sup>6</sup> or legal representative<sup>7</sup> (hereafter collectively referred to as legal representative) submits a form to USCIS, USCIS preliminarily reviews the form for completeness.<sup>8</sup> As part of the preliminary review, USCIS assigns the benefit requestor or beneficiary<sup>9</sup> an Alien Number (A-Number)<sup>10</sup> or matches the request with an existing A-Number (if applicable),<sup>11</sup> assigns the application a Receipt Number,<sup>12</sup> and forwards the benefit request form, to be consolidated in the Alien File (A-File)<sup>13</sup> or Receipt File,<sup>14</sup> to the appropriate USCIS office for adjudication.

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<sup>4</sup> See DHS/USCIS/PIA-023(a) Enterprise Citizenship and Immigrations Services Centralized Operational Repository (eCISCOR), available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

<sup>5</sup> Individuals who have filed for immigration benefits for themselves are collectively referred to as benefit requestors.

<sup>6</sup> A person who is approved by the Board of Immigration Appeals (the Board) to represent aliens before the Immigration Courts, the BIA and USCIS. He or she must work for a specific nonprofit, religious, charitable, social service, or similar organization. The organization must be authorized by the Board to represent aliens.

<sup>7</sup> An attorney or a BIA-accredited representative can represent a benefit requestor before USCIS, as a legal representative with an approved G-28, Notice of Entry of Appearance as Attorney or Accredited Representative on file.

<sup>8</sup> See DHS/USCIS/PIA-061 Benefit Request Intake Process PIA (March 16, 2016), available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

<sup>9</sup> An alien who is sponsored by a relative or a business, or has self-petitioned for an immigration benefit.

<sup>10</sup> The Alien Number is a unique seven-, eight- or nine-digit number assigned to a noncitizen at the time his or her A-File is created.

<sup>11</sup> As a general matter, USCIS does not create an Alien Number on a native born U.S. Citizen. However, in the event that a person (native born or naturalized) decides that he or she does not want to be a U.S. citizen, he or she may formally renounce his or her citizenship through Department of State (DOS). DOS sends a Certificate of Loss of Nationality to USCIS to be filed in an A-File for this purpose. In such circumstance an A-File will be created.

<sup>12</sup> The receipt number is a unique 13-character identifier that USCIS provides for each application or petition it receives. The agency uses it to identify and track its cases. The receipt number consists of three letters—for example, EAC, WAC, LIN, SRC, NBC, MSC, YSC, AAO, or IOE—and 10 numbers.

<sup>13</sup> An A-File is a paper or electronic-based file that contains official immigration records of aliens or persons who are not citizens or nationals of the United States, as well as U.S. born citizens involved in certain immigration crimes. A-Files contain all records pertaining to naturalized citizens and any active case of an alien not yet naturalized, including records created as he or she passes through the U.S. immigration and inspection process and, when applicable, records related to any law enforcement action against or involving the alien.

<sup>14</sup> Receipt Files are files of immigrant and nonimmigrant benefit filings that USCIS receives. While the Receipt Files and



CLAIMS 3 manages many types of benefit request forms, each with its own unique eligibility requirements and required data elements.<sup>15</sup> USCIS personnel review the benefit request package (to include the form and supplemental evidence) and enter relevant and necessary information from the benefit request form into CLAIMS 3, including the A-Number. CLAIMS 3 is configured to collect certain data elements based on the benefit being sought for adjudicative tracking and case management purposes.

When a new case is created in CLAIMS 3, the system electronically sends A-Numbers to the Central Index System (CIS) to either create a record or update an existing record.<sup>16</sup> The purpose of CIS is to provide a searchable central index of A-Files and to support the location and transfer of A-Files among DHS personnel and offices as needed in support of immigration benefits and enforcement actions. CIS helps ascertain an individual's current immigration status and prior status. CIS returns information associated with the A-Number, including name, date of birth, and country of birth for verification purposes. CLAIMS 3 also interfaces with the National File Tracking System (NFTS), which is an automated file-tracking system used to maintain an accurate file inventory and track the physical location of files (i.e., A-Files and Receipt Files), to share file location information about newly receipted applications, and to electronically input the A-Number, Receipt Number, and File Control Office (FCO) to the NFTS.<sup>17</sup>

When a user requires the A-File, the user goes to CIS and requests the file. CIS has a direct interface with NFTS, and receives the following information from it on the applicant: full name, the primary tracking number A-Number) and date of birth. NFTS maintains this information in order to control the inventory of all files, query the file location, manage the request and transfer of files between offices and to/from the FCOs, provide reports to support management and cleanup efforts, and gather statistical information to improve the records processes. NFTS does not store a digitized copy or the entire content of the immigration files. When the FCO receives the request for the A-File, the A-number and the person's full name and date of birth are printed on the pull ticket so that the FCO can verify the correct A-File is being pulled. When a user requires any file other than the A-File, he or she must go into NFTS directly and using the primary tracker number, submit a request for the File. The pull ticket only has the primary tracker number and no other information.

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supporting documentation are eventually consolidated into an A-File, Receipt Files allows USCIS adjudicators to begin processing cases in a quick and efficient manner.

<sup>15</sup> See Appendix A for a full list of benefit request forms processed by CLAIMS 3.

<sup>16</sup> See DHS/USCIS/PIA-009 Central Index System (CIS), available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

<sup>17</sup> See DHS/USCIS/PIA-032 NFTS, available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).



### ***Case Processing***

Each USCIS regional field office is responsible for reviewing benefit request forms under its jurisdiction and may identify cases ready for adjudicative review either manually or electronically. Each Service Center has developed tools and methods that use CLAIMS 3 data to separately manage and prioritize cases. See Appendix B for a complete description of these tools and methods.

As noted above, USCIS uses CLAIMS 3, which contains information provided by the individual on the benefit request form, to process and adjudicate benefit request forms. Information from the benefit request forms may vary depending on the benefit request sought by the individual. Additionally, USCIS records adjudicative steps that have been completed in CLAIMS 3, such as appointments to submit biometrics, other benefit request receipts pending with USCIS, the issuance of a notice, and a flag indicating suspected fraudulent activity or referral to Fraud Detection and National Security (FDNS) Directorate.

USCIS personnel review all case-related information provided by the benefit requestor or his or her representative, including supplementary evidence and review the A-File (if available) to verify the identity and benefit eligibility of the benefit requestor. In limited circumstances, USCIS may use other systems to automate the case processing and adjudication for certain benefit requests (based on the service center location or form type). The system evaluates each case to determine if it meets all eligibility criteria.<sup>18</sup> Cases that meet the criteria are batched for quality review by USCIS personnel prior to noting approval in CLAIMS 3. Cases that do not meet the eligibility criteria are batched for manual officer adjudication. See Appendix C for a complete description of the systems used to support automated adjudication.

### ***A-File Review, if applicable***

USCIS personnel may retrieve and review an individual's physical or electronic A-File (via the Enterprise Document Management System (EDMS)) when adjudicating a benefit request form.<sup>19</sup> USCIS

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<sup>18</sup> USCIS uses CasePro (See DHS/USCIS/PIA-040 CasePro available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy)) and System Electronic Registration Approval (SERA) (See DHS/USCIS/PIA-058 SERA, available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).) to automate the processing of Temporary Protected Status (SERA Only), Deferred Action for Childhood Arrivals (DACA), and Deferred Enforced Departure (DED) filings. Benefit requestors submit these filings within a select and short filing period.

During the filing period, the Vermont Service Center (VSC) or California Service Center (CSC) may experience a significant increase of filings causing processing delays. The manual adjudication of these benefits are time-consuming, and limited the number of cases an adjudicator is able to complete on a daily basis. Through automated processing, both CasePro and SERA streamline the adjudication process for the aforementioned filings and significantly reducing the case processing times.

<sup>19</sup> EDMS is a web-based system that allows authorized users to view and search electronic copies of the paper-based case files.

Prior to the implementation of EDMS, USCIS manually provided case files to the USCIS, ICE, or CBP in need of the file. USCIS developed EDMS to facilitate efficient information sharing. See DHS/USCIS/PIA-003(a) Integrated Digitization Document Management Program (IDDMP), available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).



personnel may consolidate the form, supporting documentation, and any other case information into the individual's A-File. USCIS personnel may also use the A-File to determine if the benefit requestor or beneficiary has had prior involvement with USCIS or any other DHS Components, such as U.S. Immigration and Customs Enforcement (ICE) or U.S. Customs and Border Protection (CBP) which also contribute to and manage A-File content.<sup>20</sup> This review may provide information relevant to establishing eligibility for the immigration benefit being sought.

### ***Supporting Documentation and Notices***

USCIS requires supporting documentation (submitted by the requestor) as initial evidence of a benefit requestor's identification and eligibility for a benefit. Examples of supporting documentation include: copies of civil documents such as birth, marriage, or adoption certificates; divorce decrees; affidavits of financial support; criminal records; and school records. Certain forms require individuals to provide credible evidence establishing a relationship between the benefit requestor and beneficiary.<sup>21</sup>

If a benefit requestor or beneficiary fails to submit evidence or provides insufficient evidence to establish eligibility, USCIS will use the information stored in CLAIMS 3 to issue a Request for Evidence (RFE)<sup>22</sup> or Notice of Intent to Deny (NOID)<sup>23</sup> for continued processing. USCIS personnel use a correspondence generator tool to create and store most correspondence, including RFEs and NOIDs. These correspondence generator tools create RFEs and NOIDs using pre-defined templates and standard text.<sup>24</sup> In order to generate notices, USCIS personnel manually enter data into the correspondence generator tool or the tool receives information directly from CLAIMS 3 or eCISCOR. USCIS sends the notices directly to the benefit requestor and/or her or his representative with instructions on how to respond. If a Form G-28, *Notice of Entry of Appearance as Attorney or Accredited Representative*, is on file with USCIS, then USCIS sends copies of the notices to legal representatives. If the benefit requestor

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<sup>20</sup> When a foreign citizen enters the United States legally or illegally, USCIS, ICE, or CBP assigns the individual an A-number. In the event that an individual was inadvertently issued more than one A-Number, USCIS lists all A-Numbers in his or her CIS record. USCIS consolidates all A-Numbers in CIS by identifying primary and secondary A-Numbers. A primary A-Number is the number currently assigned to the surviving physical paper file and it the first number listed in CIS. Secondary A-Numbers are those that been consolidated into the primary A-Number, and are listed below the primary number.

<sup>21</sup> For example, Form I-730. Certain petitions allow individuals to petition on behalf of family members (children and spouses). To prove a child-parent relationship, a birth certificate maybe required. Evidence of any legal change must also be submitted if the names on the birth certificate do not match the names on the petition.

<sup>22</sup> USCIS uses an RFE when an application lacks required documentation or the adjudicator needs additional evidence to determine an applicant's eligibility for the benefit sought. The request will indicate what evidence or information USCIS needs to fully evaluate the application or petition under review.

<sup>23</sup> A NOID is a formal statement from USCIS that it has determined that the applicant is ineligible for the immigrant benefit requested. The issuance of a NOID is required when derogatory information is uncovered during the course of the adjudication that is not known to the individual, according to 8 CFR § 103.2(b)(16). However, USCIS will grant the applicant an opportunity to overcome this determination and demonstrate that he or she is eligible.

<sup>24</sup> See the forthcoming USCIS Benefit Decision and Output PIA for more information, available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).



or legal representative does not respond to the RFE or NOID by the required date set by USCIS, USCIS may deny the benefit request.<sup>25</sup>

### ***Screening (Background, Identity, and Security Checks)***

All individuals submitting benefit requests are subject to background, identity, and security checks to ensure eligibility for the requested benefit and to ensure that they do not pose a threat to public safety or to the national security of the United States.<sup>26</sup> USCIS conducts background, identity, and security checks as part of case processing. USCIS requires benefit requestors and beneficiaries for certain immigration benefits to submit their biometrics along with and biographic information provided in the benefit request to USCIS for background, identity, and security checks.

Once USCIS receives the completed benefit request form, USCIS schedules individuals to be fingerprinted and have their photograph taken at an Application Support Center (ASC). USCIS uses the National Appointment Scheduling System (NASS) to schedule appointments for fingerprinting at an ASC. USCIS personnel may schedule appointments automatically or manually.<sup>27</sup> NASS automatically generates appointments on a weekly basis through an interconnection with CLAIMS 3. USCIS personnel may manually expedite the process by requesting an appointment for certain benefit requestors directly in NASS.

USCIS collects biometric data at an authorized biometric capture site, including USCIS offices and ASC. At the biometric collection site, USCIS electronically captures the benefit requestor's fingerprints and related biographic data required to verify the individual's identity and to ensure that the correct biographic information is associated with the captured biometrics. Biometric data is captured in Customer Profile Management System (CPMS), which is the centralized source of biometric images used for USCIS benefit card and document production.<sup>28</sup> Biometric and biographic data are also sent from the respective USCIS case management system to the print production systems, where a card is produced. For CLAIMS 3, an individual's photograph, signature, and fingerprints are digitally sent to and stored in the Biometric Retrieval Utility (BRU), which is a subsystem of CLAIMS 3, and is used for card production purposes.

USCIS manually enters background and security check results into CLAIMS 3 with the exception of the results of Federal Bureau of Investigation (FBI) fingerprint checks.<sup>29</sup> This information includes:

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<sup>25</sup> Generally, the standard maximum response time is 12 weeks (84 days). Adjudicators, in their discretion, may reduce the standard response time only after obtaining supervisory concurrence. This discretion may be used on a case-by-case basis when warranted by circumstances as determined by the adjudicators and the supervisor.

<sup>26</sup> See DHS/USCIS/PIA-033 Immigration Benefits Background Check Systems (IBBCS) and DHS/USCIS/PIA-060 Customer Profile Management System, available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

<sup>27</sup> See DHS/USCIS/PIA-057 NASS, available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

<sup>28</sup> See DHS/USCIS/PIA-060 Customer Profile Management Service available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

<sup>29</sup> USCIS conducts both biometric and biographic background, identity, and security checks by querying a number of USCIS, DHS, and other U.S. Government systems. These checks allow USCIS to determine if the individual is who he or



the source and date of the background check, the return of any unclassified derogatory results and whether the results were resolved, and the expiration date of the results. All background, identity, and security check results are either initiated through manual or electronic processes outside of CLAIMS 3.<sup>30</sup> A summary of the background, identity, and security check may also be printed and stored in an A-File, but is not stored in CLAIMS 3.

Information from benefit request forms maintained in CLAIMS 3 may also be referred to the FDNS Directorate, through manual or automated referral processes for screening and for investigation of fraud, public safety, and/or national security concerns. The DHS/USCIS/PIA-013-01 FDNS and DHS/USCIS/PIA-013 FDNS-DS PIAs provide an in-depth discussion of the FDNS Directorate and automated screening evaluating the privacy risks and mitigation strategies built into each process.<sup>31</sup>

### **Interview**

USCIS conducts interviews for certain benefit requests as part of the benefit adjudication process. A benefit requestor or beneficiary may be required to appear for an interview at a domestic Field Office. Adjustment of Status (AOS) Scheduler, a CLAIMS 3 subsystem, is used to schedule interview appointments, to track the date and status of interview appointments, and to generate interview notices.<sup>32</sup> AOS Scheduler stores the date, time, location, status of interview, and notice sent date. USCIS personnel mail the Interview Notice to the benefit requestor and, if applicable, his or her legal representative. Interview information is also added to the A-File, as required by case adjudication Standard Operating Procedures (SOPs).

All individuals who arrive at a USCIS Field Office for an interview are biometrically verified via photographs and two fingerprints (2-print) verification. USCIS uses a verification tool called Identity Verification Tool (IVT).<sup>33</sup> IVT allows USCIS Field Offices to compare an individual's biometric (fingerprint and photograph) and biographic information to information previously captured at an ASC, ensuring that the person who appeared at the ASC is the same person appearing at the USCIS Field Office.

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she purports to be, as well as whether there are any criminal or national security-related issues associated with the benefit requestor or beneficiary that may adversely affect his or her eligibility for the requested immigration benefits.

<sup>30</sup> FD-258 MF, a CLAIMS 3 subsystem, maintains information on individual applicants' fingerprint status. Each record contains applicant information that was sent to the FBI, such as name, date of birth, and other biographical data, as well as date fingerprinted and date sent to FBI. The records also contain other information received from the FBI such as FBI process date and FBI search results.

<sup>31</sup> See DHS/USCIS/PIA-013-01 Fraud Detection and National Security Directorate (FDNS) and DHS/USCIS/PIA-013 Fraud Detection and National Security Data System (FDNS-DS), available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

<sup>32</sup> In the future, USCIS plans to update NASS to schedule interviews for CLAIMS 3. NASS is currently limited to scheduling appointments for biometric appointments and the system is being developed in phases to ensure the system sufficiently works. USCIS plans to expand NASS to schedule interview and other appointments until then legacy AOS is used.

<sup>33</sup> See DHS/USCIS/PIA-060 Customer Profile Management System, available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).



During the course of the interview, USCIS Field Officers may use web cameras to digitally record immigration interviews.<sup>34</sup> The recordings are temporarily recorded on a workstation and then converted onto an encrypted digital optical disc storage (i.e., DVD). Once copied, the recordings are permanently erased from the workstation. The digital disc with recorded immigration interviews is then stored in the related A-File.

### ***Decision Case Action***

After all the steps discussed above are complete, USCIS personnel make a final determination on the benefit request. USCIS personnel may grant, deny, or revoke an immigration benefit. USCIS personnel may also allow the benefit requestor or beneficiary to withdraw his or her request for the benefit. In certain circumstances, a benefit request may also be administratively closed. Case decision actions are tracked and recorded in CLAIMS 3.

Following an adjudication decision, USCIS uses various tools to generate correspondence and print documents. This process is further detailed in the forthcoming USCIS Benefit Decision and Output PIA.<sup>35</sup>

### ***Post-Decision Reporting***

USCIS uses the information contained in CLAIMS 3 to generate a number of statistical reports to measure and evaluate workload for proper resource allocation. CLAIMS 3 interfaces with the Standard Management Analysis and Reporting Tool (SMART) (which pulls information from eCISCOR<sup>36</sup>) to create customizable reports for a variety of purposes.<sup>37</sup> SMART uses CLAIMS 3 data to generate reports to identify pending cases and to measure productivity trends and average processing times. USCIS also generates granular level reports to identify types, number, and status of cases located in a particular office or assigned to a particular USCIS staff member, which allows supervisors to identify the oldest cases in queue for processing.

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<sup>34</sup> 8 C.F.R. § 335.2 (c) states that USCIS officer's conducting an examination of the applicant for naturalization may have a videotaped transcript of the interview made, and the applicant and the Agency shall have the right to present such documentary evidence as may be required for a full and true disclosure of the facts. The recordings provide a complete record of the proceedings, which, in certain instances, may lead to enhanced detection of fraud and national security issues.

<sup>35</sup> See the forthcoming USCIS Benefit Decision and Output PIA, available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

<sup>36</sup> See DHS/USCIS/PIA-023(a) eCISCOR, available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

<sup>37</sup> See DHS/USCIS/PIA-050 Standard Management Analysis Reporting Tool (SMART), available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).



## 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?

Section 103 of the Immigration and Nationality Act (INA) provides the legal authority for this system.<sup>38</sup>

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

The following SORNs cover the collection, maintenance, and use of the information contained in CLAIMS 3 and associated systems:

- Alien File, Index, and National File Tracking System<sup>39</sup> covers the collection, use, and maintenance of applications and supplemental evidence, in addition to other information related to the individual as he or she passes through the immigration process;
- Background Check Service<sup>40</sup> covers background checks and their results; and
- Benefits Information System<sup>41</sup> covers the collection and use of immigrant and non-immigrant benefit applications, decisional data, and associated fees for adjudication.

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

CLAIMS 3, includes the Mainframe, Local Application Network (LAN), ICMS, and MFAS. The CLAIMS 3 LAN, including ICMS and MFAS as subsystems and CLAIMS 3 Mainframe (MF) Security Plans were completed on September 3, 2015 and October 14, 2015, respectively. The CLAIMS 3 LAN and MF Authority to Operate (ATO) are pending the publication of this PIA. CLAIMS 3 LAN and MF will enter into the Ongoing Authorization program, upon completion of this PIA. Ongoing Authorization requires CLAIMS 3 LAN and MF to be reviewed on a monthly basis and to maintain its security posture in order to retain its ATO.

All minor subsystems for CLAIMS 3 and associated systems are listed in Appendix D.

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<sup>38</sup> 8 U.S.C. § 1103.

<sup>39</sup> DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 78 FR 69864 (Nov. 21, 2013).

<sup>40</sup> DHS/USCIS-002 Background Check Service, 72 FR 31082 (June 5, 2007).

<sup>41</sup> DHS/USCIS-007 Benefits Information System, 73 FR 56596 (Sept. 29, 2008).



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

USCIS is working with NARA to update and consolidate the current retention schedules N1-563-04-03 and N1-566-08-12. Under the proposed update to retention schedules for CLAIMS 3, the system will delete and destroy records from 15 to 50 years from the date of the last completed action. This expanded retention schedule allows USCIS to address any follow-up inquiries or requests related to the application, including inquiries related to law enforcement, public safety, national security, and Freedom of Information Act and Privacy Act (FOIA/PA) matters.

### **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.**

Yes. Information collected through this process is covered by the PRA. A list of the immigration forms processed in CLAIMS 3, along with the OMB Control Numbers is available in Appendix A.

## **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.**

CLAIMS 3 and associated systems maintain information from in-process and adjudicated benefit requests. The information extracted from benefit request forms varies and not all forms collect the same information. Information in CLAIMS 3 and its associated systems may include the following data elements:

**Names:** first name, last name, middle name, and any aliases of the benefit requestor, beneficiary, or family members. USCIS also collects names from sponsors, preparers, attorneys, and designated representatives.

**Immigration Status:** e.g., Lawful Permanent Resident, U.S. citizen, or parolee, relating to the benefit requestor, beneficiary, family member and sponsor.

**Travel Information:** Immigration status upon entry into the United States, days spent outside the United States, dates of entry, port of entry,<sup>42</sup> immigration status expiration dates, and destination in the United States.

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<sup>42</sup> Travel information is collected from the benefit request form, not from a system-to-system interface with CBP.



**Marital Status and History:** USCIS collects information regarding current and former marital status (i.e., the marital status of the benefit requestor or beneficiary, the dates of and place of marriages or terminations, and the reason for termination).

**Addresses:** Benefit requestors, beneficiaries, family members, sponsors, attorneys, and representatives. For certain benefits, a benefit requestor or beneficiary can provide both a home address and a safe address.<sup>43</sup>

**Telephone and Facsimile Numbers:** Benefit requestors, beneficiaries, family members, sponsors, household members, attorneys, and representatives.

**E-mail Addresses:** Benefit requestors, beneficiaries, family members, attorneys, and representatives.

**Dates of Birth and Age:** Benefit requestors, beneficiaries, sponsors, and family members.

**Unique Identifying Numbers:** USCIS collects A-Numbers, Social Security numbers (SSN), USCIS ELIS account numbers, receipt numbers, and other identifying numbers of benefit requestors, beneficiaries, family members, and sponsors.

**Citizenship/Nationality:** USCIS collects information on the benefit requestor, beneficiary, or family member's country of citizenship or nationality, and country of birth.

**Travel Information:** USCIS collects information on the benefit requestor, beneficiary, or family member's port of entry, arrival and departure dates, passport number, passport place of issue, passport issue date, passport expiration date, travel document number, travel document country of issue, and travel document expiration date.

**Gender:** Benefit requestors, beneficiaries, and family members.

**Personal Characteristics:** Benefit requestor or beneficiary's hair color, eye color, height, weight, race, and ethnicity.

**Information about the attorney, representative, preparer or interpreter:** Full name, business or organization, mailing address, e-mail address, phone number, fax number, signature, language spoken, relationship to the benefit requestor or beneficiary (if applicable). USCIS also collects Attorney Bar Number or equivalent, Bar Membership, Accreditation Date, Board of Immigration Appeals Representative Accreditation Expiration Date, and Law Practice Restriction Explanation.

**Biometrics:** Benefit requestor or beneficiary's biometric images such as press-print, photograph, details about those images (e.g., capture date), and signature of benefit requestor, beneficiary, interpreter, and representative.

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<sup>43</sup> Benefit requestors may use an alternative mailing address, a "safe address," on their benefit requests. USCIS will use this safe address as the mailing address for all correspondence regarding the victim's immigration relief. Using a safe address protects the victim's privacy and maintains confidentiality.



**Card Data:** Includes details about cards issued for approved applications such as card serial number, RFID data associated with the Employment Authorization Document and the Permanent Resident Card, production site, production status, and time/date stamp of cards.

**Tax and Financial Information:** USCIS collects tax identification numbers, and financial information (check information, bank account numbers, credit card numbers (the last four digits only) and other tax and financial information information).

**Results of Background Identity and Security Checks:** Date of the background check, whether the check returned any derogatory results, whether those results were resolved, and expiration date of the results.

**Certifying Agency Information (if applicable):**<sup>44</sup> Information collected about the certifying agency includes agency name, certifying official name, title of certifying official, address, phone, fax, agency type, case status, agency category, case number, FBI Number, or State Identification (SID) Number.

**Medical Information:** USCIS collects medical information to establish that an applicant is not inadmissible to the United States on public health grounds, as well as in support of a request for an accommodation during an interview. Such information may indicate alcoholism, declaration of incompetence, or family medical history.

**Employment Information:** USCIS collects employment information (place and address of employment/occupation, type of work, employer name, length of employment, spouse's employment) in CLAIMS 3 to determine the benefit requestor and beneficiary's eligibility.

**Military and Selective Service Information:** USCIS collects information evidencing Selective Service registration and military service (e.g., Selective Service number, date of registration, application for military exemption, military branch, willingness to bear arms for the United States of America) in CLAIMS 3 to verify that the benefit requestor or beneficiary has registered with Selective Service as required by law.

**Information Regarding Organization Membership or Affiliation:** USCIS collects information regarding an applicant's organization memberships and affiliations (organizations, associations, clubs, foundations, parties, societies, or similar groups; communist party membership; totalitarian party membership; terrorist organization membership) in CLAIMS 3 to determine whether

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<sup>44</sup> For certain immigration benefits, individuals are required to work with an agency who certifies that the individual "has been helpful, is being helpful, or is likely to be helpful" in the investigation or prosecution of the criminal activity. Certifying agencies include federal, state, or local law enforcement agencies, prosecutors, judges, or other authority that investigates or prosecutes criminal activity. Other agencies such as child protective services, the Equal Employment Opportunity Commission, and the Department of Labor also qualify as certifying agencies since they have criminal investigative jurisdiction within their respective areas of expertise. See 8 CFR § 214.14(a)(2).



the applicant poses a security threat to the United States or individuals or has participated in activities that may disqualify him or her for a requested benefit.

**Criminal History or Involvement and Moral Character Issues:**<sup>45</sup> USCIS collects information regarding an applicant's criminal history, involvement in criminal activities, and information regarding moral character in CLAIMS 3 to assess whether the applicant meets the standards contained in the INA.

**Case Processing Information:** USCIS records case processing information such as date USCIS received or filed benefit requests; benefit request status; location of record; other control number when applicable; fee receipt data; status of USCIS appointments and interviews; date of issuance of a notice, and whether the benefit request form was referred to FDNS for review.

**Final Decision:** Includes a notice to the benefit requestors, beneficiary, and/or the representative on record, approval/denial code, etc.

Many USCIS forms require the submission of supplemental forms to establish eligibility for the benefit. Examples of supplemental evidence may include, but is not limited to, marriage certificates, birth certificates, tax records, court records, appeals and motions, personal narratives, and affidavits and sworn statements (of benefit requestors and qualifying witnesses) including details of victimization, criminal records, and terrorist engagement. The supplemental information is stored in the A-File.

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

Information within CLAIMS 3 is derived from the following sources: (1) benefit requestors, beneficiaries, accredited representatives, form preparers, and/or interpreters, (2) internal DHS systems, and (3) external systems.

Most of the information in CLAIMS 3 is derived from the data provided by the benefit requestor or beneficiary on the completed immigration form and documentation in support of his or her benefit request. CLAIMS 3 either automatically receives benefit request form information from an interconnected system or USCIS staff manually enter information submitted on the USCIS form into CLAIMS 3. Most background check results are also manually entered into CLAIMS 3. Certain background check results are uploaded into CLAIMS 3 in a semi-automated batch process. Please see the Appendices for a full list of immigration forms and background checks tracked in CLAIMS 3.

### *USCIS Systems*

- CIS sends A-Number verification.

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<sup>45</sup> See INA §101(f), § [316\(e\)](#), and [8 CFR § 316.10](#)



- Fingerprint Processing Mainframe (FD-258 MF), a module of CLAIMS 3 MF, sends fingerprint and name check results to CLAIMS 3.<sup>46</sup>
- MFAS, a module of CLAIMS 3, sends Conditional Permanent Residency approval to CLAIMS 3.
- Private Attorney Maintenance System (PAMS), a module of Refugee, Asylum, and Parole System (RAPS), sends attorney data confirmation to CLAIMS 3.
- RAPS, sends applicant address changes and employment authorization to CLAIMS 3.<sup>47</sup>
- CPMS sends name, receipt number, date of birth, A-Number, and SSN, if applicable.
- Integrated Card Production System sends the status of card production to CLAIMS 3.<sup>48</sup>
- NFTS sends file location to CLAIMS 3.

### ***DHS Systems***

- ICE Student and Exchange Visitor Information System (SEVIS) sends SEVIS processing status from SEVIS to CLAIMS 3.<sup>49</sup>

### ***External Systems***

- FBI/Central Records System and Universal Index sends name check results to FD-258, which then automatically sends information to CLAIMS 3.<sup>50</sup>
- Department of Labor/Permanent Labor Certification (PERM) and iCERT provides CLAIMS 3 information regarding permanent and temporary labor certifications and non-immigrant labor condition applications submitted by employers for Department of Labor approval.

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<sup>46</sup> FD-258 MF is a module of the USCIS MF application CLAIMS 3 MF. FD-258 MF maintains information on individual applicants' fingerprint status. FD-258 MF contains applicant information that was sent to the FBI, such as Name, Birth Date, and other biographical data, as well as Date Fingerprinted and Date Sent to FBI. It also contains other information received from the FBI such as FBI Process Date and FBI Search Result. See DHS/USCIS/PIA-033 Immigration Benefits Background Check Systems (IBBCS), available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

<sup>47</sup> See DHS/USCIS/PIA-027(b) Refugees, Asylum, and Parole System (RAPS) and the Asylum Pre-Screening System (APSS) Update, available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

<sup>48</sup> ICPS prepares, manages, and processes benefit card order requests from internal and external interfacing systems. See forthcoming Benefit Decision and Output PIA, available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

<sup>49</sup> SEVIS is an ICE Internet-based application for electronically tracking and reporting on foreign students, Exchange Visitors (EV), and their dependents in the United States. SEVIS enables schools and program sponsors to transmit data electronically to the DHS and the Department of State (DOS) throughout a students or EV's program in the United States. See DHS/ICE/PIA-001(a) Student and Exchange Visitor Information System II (SEVIS), available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

<sup>50</sup> DOJ/FBI-002 Central Records System, 66 FR 29994 (June 4, 2001).



### 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.

### 2.4 Discuss how accuracy of the data is ensured.

USCIS collects information primarily from the benefit requestor or beneficiary or his or her representative. CLAIMS 3 also receives information from USCIS, DHS, and external government systems. CLAIMS 3 helps validate data entry through program coding to mitigate or prevent inconsistencies in applicant data and in decision processing entries (e.g., the system rejects 00/00/00 birthdates).

Data is entered into CLAIMS 3 automatically and manually. Almost all information is input into CLAIMS 3 automatically except:

- USCIS staff may manually enter information submitted on a USCIS benefit request form into CLAIMS 3 (during the initial intake process); and
- USCIS manually enters background and security check results into CLAIMS 3 with the exception of the results of FBI fingerprint checks.

For manually entered data, all USCIS data entry personnel are provided with the opportunity to review and edit information prior to and after its submission. USCIS personnel verify the accuracy by comparing information provided by the individual with information contained in the individual's A-File and from federal law enforcement systems. USCIS also verifies data accuracy with the benefit requestor or beneficiary during the interview process. USCIS personnel can correct and edit inaccuracies at any stage of the process.

### 2.5 **Privacy Impact Analysis:** Related to Characterization of the Information

**Privacy Risk:** There is a risk of inaccurate data due to manual data entry throughout the adjudication process.

**Mitigation:** USCIS partially mitigates this risk through training, supervisor reviews, and ongoing quality assurance reviews. To establish and maintain quality and consistency in processing benefit request forms, all supervisors must ensure that all employees under their supervision involved in the processing of benefit request forms, including the Quality Assurance Reviewer, have been trained on these procedures. USCIS personnel and contractors who process benefit request forms are required to be recertified every two years by receiving on-the-job training.<sup>51</sup>

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<sup>51</sup> All immigration officers are required to take BASIC training, where human factors are involved, and demonstrates



USCIS requires supervisory reviews to be conducted by a Supervisory Immigration Services Officer (SISO), or by an Immigration Services Officer II or higher who possesses sufficient technical skills and significant experience in the adjudication of benefit request forms and was not involved in the adjudication of the case. USCIS policy requires the reviewing officer to attend and complete all required trainings.

The SISO either concurs with the officer's recommendation or notes the reason(s) for non-concurrence within the Adjudication Processing Worksheet, and returns the file to the adjudicating officer for appropriate action.

During the Quality Assurance Reviews, individual case files are randomly selected and reviewed by a team of experienced adjudicators. Reviewers use a checklist to assess and record the quality of each case.

USCIS is working to automate the process and remove the opportunity for human error. In addition, CLAIMS 3 and its associated systems ensure data accuracy through program coding to mitigate or prevent inconsistencies in data and in decision processing entries by employee training. Finally during the interview, the benefit requestor or beneficiary is able to confirm data and update information as necessary.

**Privacy Risk:** There is a risk of over-collection of information for making a benefit determination.

**Mitigation:** The USCIS Office of Privacy reviews each immigration form during the form development process and/or promulgation process to ensure that only the minimum amount of information is collected to determine benefit eligibility. Furthermore, all data elements collected are negotiated with and approved by OMB during PRA collection review.

USCIS designed CLAIMS 3 specifically to collect and store only the information that is necessary to adjudicate the benefit request forms processed by USCIS. USCIS requires the information collected and stored in CLAIMS 3 to establish the identity of the benefit requestor or beneficiary and to process the benefit request to determine benefit eligibility.

**Privacy Risk:** There is a risk that information in CLAIMS 3 is replicated and shared via eCISCOR and therefore may be inaccurate.

**Mitigation:** This risk cannot be mitigated. USCIS uses eCISCOR to share CLAIMS 3 information more efficiently with other USCIS systems for interoperability purposes. If constant queries were performed against CLAIMS 3, which is a live transaction system designed to perform real-time daily tasks for USCIS customers, the primary source system functionality would significantly decrease.

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unsurpassable standards of professionalism and ethical conduct. The BASIC curriculum covers public service, immigration law, customer service, fraud and national security, and other topics to ready new immigration officers for the task of ensuring the right benefit to the right person at the right time.



The CLAIMS 3 system lag would cause considerable mission disruption. Therefore, USCIS relies on the eCISCOR system to perform queries. To mitigate the risk of inaccurate data within eCISCOR, eCISCOR refreshes from CLAIMS 3 and other source systems on a daily basis (generally overnight). A daily refresh is the most frequent timeframe for refresh that USCIS can implement without impacting the functionality of the live transaction source systems.

## 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 CLAIMS 3 and its associated systems to support and manage the administration and adjudication of certain benefit requests. Specific uses of CLAIMS 3 and the information it contains include:

- Identify missing information and make requests for additional information;
- Provide a repository of data to assist with future immigration benefit requests;
- Schedule interview and biometrics appointments;
- Facilitate and maintain security screening check results to determine suitability for immigration benefits using criminal, immigration, or terrorism-related history;
- Generate and issue notices;
- Provide data necessary to assist in the determination of immigration and employment status to support the Verification Program;
- Manage adjudicative workflow;
- Share information with internal and external partners for mission-related activities; and,
- Generate reports.

### 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.

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

Yes. DHS Components have read-only access to CLAIMS 3 to perform mission requirements.



CBP uses CLAIMS 3 border enforcement purposes. ICE uses CLAIMS 3 for immigration investigation purposes. Intelligence and Analysis (I&A) analysts may access CLAIMS 3 for national security purposes. The Citizenship and Immigration Services Ombudsman's Office uses CLAIMS 3 for its USCIS oversight responsibilities.

### 3.4 **Privacy Impact Analysis: Related to the Uses of Information**

**Privacy Risk:** There is a risk that authorized users could use the data for purposes inconsistent with the original collection.

**Mitigation:** To ensure the information is used consistently with the purposes of the original collection, USCIS administrators monitor internal and external user logs to ensure users are only accessing information related to their job functions. Prior to accessing CLAIMS 3, each user must sign a user access agreement that outlines the appropriate rules of behavior tailored to CLAIMS 3. USCIS implements disciplinary rules as a means to govern the use of the system. USCIS reminds employees accessing the system that the system may be monitored for improper use and illicit activity, and the penalties for non-compliance, through a warning banner that reiterates the appropriate uses of the system. All user actions are tracked via audit logs to identify audit information by user identification, network terminal identification, date, time, and data accessed. This acts as a deterrent to unauthorized activity. Additionally, all USCIS employees are required to complete role-based and adjudicator training prior to accessing CLAIMS 3.

**Privacy Risk:** There is a risk that unauthorized users may gain access to CLAIMS 3.

**Mitigation:** All records are protected from unauthorized access through appropriate administrative, physical, and technical safeguards such as restricting access to authorized personnel who have a need-to-know. CLAIMS 3 is a web-based application that is only available through the DHS USCIS network. Access to CLAIMS 3 is granted to only a limited number of users for mission-related purposes. Access is granted based on the user's job function (i.e., receipting, clerk, adjudicator) and physical location (i.e., Vermont, Texas, Nebraska, California, Virginia, or field offices). CLAIMS 3 users must have access to the USCIS network and have USCIS credentials.

Authorized employees must use their issued credentials, also known as PIV cards, to access CLAIMS 3. Employees, who do not require access to CLAIMS 3, will not be able to access CLAIMS 3 with their PIV card. Access to the system via PIV card is consistent with the National Institute of Standards and Technology 800-63 Level 4-assurance of the user's identity.<sup>52</sup> Finally, USCIS deploys user logs to ensure users are only accessing information related to their job functions.

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<sup>52</sup> See NIST Special Publication (SP) 800-63-2, Electronic Authentication Guideline, dated August 2013, available at <http://csrc.nist.gov/publications/nistpubs/800-63-1/SP-800-63-1.pdf>.



## 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.**

Each benefit request form contains a Privacy Act Statement that provides notice to individuals about the collection, USCIS's authority to collect information, the purposes of data collection, routine uses of the information, and the consequences of declining to provide the requested information to USCIS. The forms also contain a provision by which an applicant authorizes USCIS to release any information received from the benefit requestor or beneficiary as needed to determine eligibility for benefits. Additionally, individuals receive general notice through this PIA, DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking SORN, DHS/USCIS-002 Background Check Service SORN, and the DHS/USCIS-007 Benefits Information System SORN.

### **4.2 What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project?**

By submitting benefit request forms to USCIS, applicants have consented to USCIS use of the information submitted for adjudication purposes. Applicants who apply for USCIS benefits have an opportunity and ability to decline to provide information. USCIS benefit applications require the applicant to provide biographic and/or biometric information. This information is critical in making an informed adjudication decision to grant or deny a USCIS benefit. Failure to submit such information may prohibit USCIS from processing and properly adjudicating the application and thus precludes the applicant from receiving the benefit.

### **4.3 Privacy Impact Analysis: Related to Notice**

There is no privacy risk associated with notice because all information is provided voluntarily and USCIS provides notice to individuals through a Privacy Act Statement, this PIA, and the associated SORNs.

## 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.**

USCIS is working with NARA to update and consolidate the current retention schedules: N1-563-04-03 and N1-566-08-12. Under the proposed update retention schedule for CLAIMS 3, the system



will retain records 50 years from the date of the last completed action. This retention schedule allows USCIS to address any follow-up inquiries or requests related to the application, including inquiries related to security and FOIA/PA matters.

### 5.2 Privacy Impact Analysis: Related to Retention

**Privacy Risk:** USCIS's extension of the retention period from 15 years to 50 years creates a risk of retaining the data for longer than necessary, which may lead to stale or inaccurate data.

**Mitigation:** USCIS retains CLAIMS 3 data to maintain a complete and accurate history of an individual's immigration interaction with USCIS for future benefit requests. This expanded retention schedule allows USCIS to address any follow-up inquiries or requests related to the application, including inquiries related to law enforcement, public safety, national security, and to FOIA/PA matters. Expanding the records retentions schedule allows for USCIS to provide as much information as permitted to the individual regarding his or her immigration history.

The purpose of maintaining the information in CLAIMS 3 for such a long retention period is to provide a complete history of an individual's immigration benefit history with USCIS. USCIS continues to update CLAIMS 3 as individuals continue to file immigration benefits with the agency – ensuring that the information is accurate and complete while maintaining a historical record of interactions with USCIS and benefit status changes.

## 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 shares information from CLAIMS 3 with other federal agencies for the purpose of processing applications or petitions for benefits under the INA. USCIS may also share information with federal, state, local, and foreign government agencies and authorized organizations in accordance with approved routine uses, as described in the associated published system of records notices.

#### ***Department of State (DOS)***

USCIS and DOS are partners in the processing of immigration benefit cases.<sup>53</sup> DOS has read-only access to a subset of CLAIMS 3 data. Access to CLAIMS 3 provides DOS consular officers with

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<sup>53</sup> Memorandum of Agreement between the Department of State and the Department of Homeland Security regarding the



information on USCIS adjudications of benefits and other decisions relating to non-immigrant and immigrant visas and naturalization cases. This includes data on pending benefit request forms, as well as historical information. This data sharing arrangement allows USCIS and DHS to increase processing efficiency and maintain a comprehensive picture of a benefit requestors' status from visa application to naturalization. It will reduce the likelihood that an individual or group might obtain an immigration benefit under the INA through fraud or error.

### ***Department of Labor (DOL)***

USCIS is responsible for determining if a foreign national sought by an employer to work on a temporary or permanent basis in the United States has the necessary qualifications and meets the requirements for the immigration classification. For most employment-based categories (non-immigrant and immigrant) there is a labor component that must be satisfied by employers before they may hire a foreign worker.<sup>54</sup> DOL is responsible for enforcement of labor certification violations and violations of U.S. labor laws. DOL has the ability to sanction employers that fail to comply with those laws and DHS has the authority to bar employers from seeking to bring additional foreign laborers to the United States if they have been found to be violators by DOL. To determine employer violations, DOL reviews what employers are actually doing once the foreign worker is employed versus what they promised to do/or claimed they did at the certification/petition stage.

USCIS provides DOL access to the Person Centric Query System (PCQS)<sup>55</sup> to view, on a read-only basis, data drawn from CLAIMS 3 that contain employment-based non-immigrant and immigrant petition data and DOL will provide USCIS data from its Permanent Labor Certification (PERM) system and iCERT system from the permanent and temporary labor certifications and non-immigrant labor condition applications submitted by employers for DOL approval.

### ***Selective Service System (SSS)***

The SSS is an independent federal agency that is responsible for ensuring emergency military manpower needs pursuant to the Military Selective Service Act.<sup>56</sup> USCIS provides immigrant adjustment of status and visa information on aliens subject to military conscription to SSS. SSS does not have a direct access with the CLAIMS 3 system. On a monthly basis, CLAIMS 3 provides SSS with a manually-

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*sharing of visa and passport records and immigration and naturalization and citizenship records, signed November 18, 2008.*

<sup>54</sup> This is done through filing of a labor certification (nonimmigrant and immigrant petitions) or a labor condition application (LCA) (nonimmigrant) with DOL. Before employers can import foreign labor they must agree to comply with certain U.S. laws re: paying the prevailing wage, complying with required working conditions, testing the labor market for U.S. workers, etc.

<sup>55</sup> See DHS/USCIS/PIA-010 - Person Centric Query Service, available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

<sup>56</sup> 50 U.S.C. App. 451 *et seq.*



extracted file of adjustment of status and immigrant visa information for eligible aliens. This file is sent via encrypted email from USCIS to SSS. No data is sent from the SSS to USCIS/CLAIMS 3.

### ***Social Security Administration (SSA)***

USCIS, DOS, and the SSA currently have a Memorandum of Understanding (MOU) in place that covers the process in which SSA works with USCIS to issue SSNs and Social Security cards for immigrants through a process called Enumeration at Entry (EAE).<sup>57</sup> As part of the DOS immigrant visa application process, immigrants outside the United States have the option to apply for an SSN card at the same time they apply for an immigrant visa. Once DOS approves their visa application and DHS admits them into the United States for permanent residence, SSA automatically issues the SSN card. USCIS electronically transmits to SSA enumeration data for resident aliens with employment authorization who request a SSN or replacement Social Security card. This process will allow USCIS benefit seekers to request a SSN or replacement card as part of the USCIS benefit process.

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

### ***DOS***

Sharing USCIS data with DOS is compatible with the purpose of the system because the DOS mission, like USCIS, includes ensuring lawful visits and immigration to the United States as dictated by the INA. Routine Use I of the BIS SORN permits USCIS to share information with the DOS for the purpose of assisting in the processing of benefit requests under the INA, and all other immigration and nationality laws including treaties and reciprocal agreements.

### ***DOL***

Sharing USCIS data with DOL is compatible with the purpose of the system because the respective missions are responsible for administering and enforcing the INA and other relevant immigration laws. Routine Use X of the BIS SORN permits USCIS to share information with the DOL of enforcing labor certification violations and violations of U.S. labor laws.

### ***SSS***

Sharing USCIS data with SSS is compatible with the purpose of the system because Section 453(a) of the Military Selective Service Act requires every male citizen of the United States, and every other male person residing in the United States, who is between the ages of 18 and 26, to present himself for and submit to registration. Routine Use Q of the BIS SORN permits USCIS to share information

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<sup>57</sup> *Memorandum of Understanding between Social Security Administration and Immigration and Naturalization Service (MOU)*, dated December 18, 2000. The party noted as the Immigration and Naturalization Service is now known as U.S. Citizenship and Immigration Services (USCIS). Provisions included in and addressed by the MOU are still applicable today.



with SSS to verify or ascertain the citizenship or immigration status of any individual within the jurisdiction of the agency for any purpose authorized by law.

### SSA

Sharing USCIS data with SSA is compatible with the purpose of the system because Sections 205(b)(2) of the Social Security Act, as amended, authorizes SSA to issue a Social Security card to aliens at the time of their lawful admission to the United States. Routine Use R of the BIS SORN permits USCIS to share information with the SSA for the purpose of issuing a Social Security number and card to an alien who has made a request for a Social Security number as part of the immigration process and in accordance with any related agreements in effect between the SSA, the DHS and the DOL entered into pursuant to 20 CFR 422.103(b)(3); 422.103(c); and 422.106(a), or other relevant laws and regulations.

### 6.3 Does the project place limitations on re-dissemination?

Yes. DHS or USCIS enters into Memoranda of Understanding/Agreement (MOU/A) with external organizations prior to the systematic sharing of information. When sharing information with parties outside of DHS, the same specifications related to security and safeguarding of privacy-sensitive information that are in place for USCIS and DHS are applied to the outside entity. The agreements between DHS and external entities (e.g., DOL, DOS, SSS, and SSA) fully outline responsibilities of the parties, security standards, and limits of use of the information, including re-dissemination, prior to information sharing. Access to records is governed by need-to-know criteria that demand the receiving entity demonstrate the mission-related need for the data before access is granted. In the terms of a negotiated agreement or the language of an authorization providing information to an external agency, USCIS includes justification for collecting the data, and an acknowledgement that the receiving agency will not share the information without USCIS or DHS's permission, as applicable.

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

USCIS keeps an electronic record of all CLAIMS 3 records sent to non-DHS partners. Furthermore, USCIS updates individual CLAIMS 3 case records to reflect that a specific check has been completed.

### 6.5 Privacy Impact Analysis: Related to Information Sharing

**Privacy Risk:** There is a risk that data shared by USCIS with external partners will be used beyond the original purpose of collection (immigration benefits).

**Mitigation:** USCIS is careful to share data with external agencies that have a need to know and put the information to a use that is compatible with USCIS SORNs. USCIS documents these safeguards in MOU/MOA with the external partners. All prospective information handlers must be authorized to



access the information. This mitigates the risk of unauthorized disclosure by requiring a trained employee with access to the information to review the information before sharing the information with an external agency.

**Privacy Risk:** There is a risk that USCIS may disclose protected information inconsistent with the confidentiality requirements of 8 U.S.C. § 1367.

**Mitigation:** DHS employees are aware of the importance of safeguarding information protected by 8 U.S.C. § 1367. In addition, DHS issued a new Management Directive and Instruction to remind all DHS officers and employees they are generally prohibited from permitting use by or disclosure to anyone other than a sworn officer or employee of DHS, the DOS, or the Department of Justice (DOJ) of any information relating to a beneficiary of a pending or approved application for victim-based immigration benefits.<sup>58</sup>

Prior to disclosing any information USCIS employees are required to verify the status of an individual. USCIS enhanced the Central Index System to tag records relating to a protected individual and that specific procedures regarding the disclosure and use apply to users accessing the information. CIS includes an alert message to indicate that an individual is protected by 8 U.S.C. § 1367. The message reads: *8 USC 1367 Protected Information–Disclosure and Use Restrictions Apply*. The statutory confidentiality protections at 8 U.S.C. § 1367 generally prohibit the disclosure or use of any information about applicants for, and beneficiaries of, certain victim-based immigration benefits, including T nonimmigrant status, U nonimmigrant status, or relief under the Violence Against Women Act (VAWA). Applicants for, and beneficiaries of, these benefits are those people who have been victimized by others, including human traffickers, criminal gangs, or abusive spouses. Beneficiaries may also include qualifying family members (derivatives) of the victim.

The law requires that USCIS protect information about principal applicants and their derivatives from disclosure in order to avoid endangering the victims by providing their victimizers any personal information about them. These confidentiality protections generally continue indefinitely; they may terminate only when the application for relief is denied and all opportunities for appeal of the denial have been exhausted. Any record in CIS that displays this banner must be handled as Section 1367 Information in accordance with USCIS policy

## 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.

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<sup>58</sup> DHS Management Directive 002-02 *Implementation of Section 1367 Information Provisions* (November 1, 2013) and corresponding Instruction 002-02-001.



### **7.1 What are the procedures that allow individuals to access their information?**

An individual may gain access to his or her USCIS records by filing a FOIA/PA request. If an individual would like to file a FOIA/PA request to view his or her USCIS record, he or she may mail the request to the following address:

National Records Center  
Freedom of Information Act (FOIA)/Privacy Act Program  
P.O. Box 648010  
Lee's Summit, MO 64064-8010

Further information about FOIA/PA requests for USCIS records is available at <http://www.uscis.gov>.

### **7.2 What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?**

Individuals should submit requests to contest or amend information as discussed in Section 7.1. The requestor should clearly and concisely state the information being contested, the reason for contesting or amending it, and the proposed amendment. The requestor should also clearly mark the envelope, "Privacy Act Amendment Request." The record must be identified in the same manner as described for making a request for access.

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

USCIS notifies individuals of the procedures for correcting their information in this PIA, Privacy Act Statements, and the USCIS website. Specifically, the SORNs set forth in Section 1.2 provide individuals with guidance regarding the procedures for correcting information. The Privacy Act Statements, including notice of an individual's right to correct information, are also contained on the instructions to immigration forms published by USCIS.

### **7.4 Privacy Impact Analysis: Related to Redress**

There is no risk associated with redress in relation to CLAIMS 3. USCIS provides individuals with access to his or her records in CLAIMS 3 when requested through a FOIA/PA request. The information requested may be exempt from disclosure under the Privacy Act because information contained within CLAIMS 3 may contain law enforcement sensitive information, the release of which could possibly compromise ongoing criminal investigations.

## **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?**

USCIS ensures that practices stated in this PIA comply with internal USCIS policies, including the USCIS privacy policies, SOPs, information sharing agreements, orientation and training, rules of behavior, and auditing and accountability.

CLAIMS 3 has an audit trail capability to monitor user activities and generate alerts for unauthorized access attempts. The general audit log and the security log allow the Global Administrator to select event type, such as access or login, and the data displayed includes timestamp, name, IP, transaction, and site. The other log is the auto lock log and the display for it shows the employee's name, last login, auto lock date with time, reinstate date with time, username, and site. This auditing is a strong influence for users to use CLAIMS 3 appropriately.

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

USCIS employees and contractors are required to complete annual Privacy and Computer Security Awareness Training to ensure their understanding of proper handling and securing of PII. Privacy training addresses appropriate privacy concerns, including Privacy Act obligations (e.g., SORNs, Privacy Act Statements). The Computer Security Awareness Training examines appropriate technical, physical, and administrative control measures. Leadership at each USCIS office is responsible for ensuring that all federal employees and contractors receive the required annual Computer Security Awareness Training and Privacy training.

### **8.3 What procedures are in place to determine which users may access the information and how does the project determine who has access?**

USCIS deploys user role-based access controls and enforces a separation of duties to limit access to only those individuals who have a need-to-know in order to perform their duties. Each operational role is mapped to the set of system authorizations required to support the intended duties of the role. The mapping of roles to associated authorizations enhances adherence to the principle of least privilege. Authorized users are broken into specific classes with specific access rights. This need-to-know is determined by the respective responsibilities of the employee. These are enforced through DHS and USCIS access request forms and procedures.

### **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?**

USCIS has a formal review and approval process in place for new sharing agreements. Any new use of information or new access requests for the system must go through the USCIS Change Control



Process and must be approved by the proper authorities of this process, such as the USCIS Privacy Officer, Chief of Information Security Officer, Office of Chief Counsel, and the respective Program Office.

## **Responsible Officials**

Donald K. Hawkins  
Privacy Officer  
U.S. Citizenship and Immigration Services  
Department of Homeland Security

## **Approval Signature**

Original signed copy on file with the DHS Privacy Office.

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Karen L. Neuman  
Chief Privacy Officer  
Department of Homeland Security



## Appendix A

### USCIS Immigration Forms and Associated OMB Control Numbers processed in CLAIMS 3

| <b><u>Form Number</u></b> | <b><u>Form Name</u></b>                                                     | <b><u>OMB Control Number</u></b> |
|---------------------------|-----------------------------------------------------------------------------|----------------------------------|
| <b>EOIR-26</b>            | Notice of Appeal from Decision of Immigration Judge                         | 1125-0002                        |
| <b>EOIR-29</b>            | Notice of Appeal from Decision of District Director                         | 1125-0010                        |
| <b>I-102</b>              | Application for Replacement/Initial Nonimmigrant Arrival-Departure Document | 1615-0079                        |
| <b>I-129</b>              | Petition for Nonimmigrant Worker                                            | 1615-0009                        |
| <b>I-129B</b>             | Petition for Nonimmigrant Worker                                            | 1615-0009                        |
| <b>I-129BF</b>            | Petition for Nonimmigrant Worker: FTA                                       | 1615-0009                        |
| <b>I-129CW</b>            | Petition for CNMI-Only Nonimmigrant Transition Worker                       | 1615-0111                        |
| <b>I-129F</b>             | Petition for Alien Fiancé(e)                                                | 1615-0001                        |
| <b>I-129H</b>             | Petition for Nonimmigrant Worker: H-1, H-2, or H-3                          | 1615-0009                        |
| <b>I-129HF</b>            | Petition for Nonimmigrant Worker: H-1, H-2, or H-3 - FTA                    | 1615-0009                        |
| <b>I-129L</b>             | Petition to Employ Intra-Company Transferee                                 | 1615-0009                        |
| <b>I-129LF</b>            | Petition to Employ Intra-Company Transferee FTA                             | 1615-0009                        |
| <b>I-129S</b>             | Nonimmigrant Petition Based on Blanket L Petition                           | 1615-0010                        |
| <b>I-130</b>              | Petition for Alien Relative                                                 | 1615-0012                        |
| <b>I-130A</b>             | Supplemental Information for Spouse Beneficiary                             | 1615-0012                        |
| <b>I-1300</b>             | Immigrant Petition for Relative                                             | 1615-0012                        |
| <b>I-130S</b>             | Visa Petition for Spouse                                                    | 1615-0012                        |
| <b>I-131</b>              | Application for Travel Document                                             | 1615-0013                        |
| <b>I-131A</b>             | Application for Travel Document (Carrier Documentation)                     | 1615-0135                        |



|                           |                                                                                                |           |
|---------------------------|------------------------------------------------------------------------------------------------|-----------|
| <b>I-131B</b>             | Effective Date for I131 Advanced Parole Approvals Sent to ICPS                                 | 1615-0013 |
| <b>I-140</b>              | Immigrant Petition for Alien Workers                                                           | 1615-0015 |
| <b>I-191</b>              | Application for Advance Permission to Return to Unrelinquished Domicile                        | 1615-0016 |
| <b>I-192</b>              | Application for Advance Permission to Enter as Nonimmigrant                                    | 1615-0017 |
| <b>I-193</b>              | Application for waiver of Passport and/or Visa                                                 | 1651-0107 |
| <b>I-212</b>              | Application for Permission to Reapply for Admission into the U.S. after Deportation or Removal | 1615-0018 |
| <b>I-246</b>              | Application for Stay of Deportation                                                            | 1653-0021 |
| <b>I-290A</b>             | Appeal, Motion to Reopen or Reconsider                                                         | 1615-0095 |
| <b>I-290AA</b>            | Notice of Appeal to the Board of Immigration Appeals                                           | 1615-0095 |
| <b>I-290AP</b>            | Notice of Appeal to the Board of Immigration Appeals                                           | 1615-0095 |
| <b>I-290B</b>             | Notice of Appeal to the Administration                                                         | 1615-0095 |
| <b>I-290C</b>             | Certified Appeal, Motion to Reopen or Reconsider                                               | 1615-0095 |
| <b>I-290M</b>             | Motion to Reopen or Reconsider                                                                 | 1615-0095 |
| <b>I-352</b>              | Immigration Bond                                                                               | 1653-0022 |
| <b>I-360</b>              | Petition for Amerasian, Widower or Special Immigrant                                           | 1615-0020 |
| <b>I-407</b>              | Record of Abandonment of Lawful Permanent Resident Status                                      | 1615-0130 |
| <b>I-485</b>              | Application to Register Permanent Residence or Adjust Status and Supplement A to Form I-485    | 1615-0023 |
| <b>I-485 Supplement A</b> | Adjustment of Status Under Section 245(i)                                                      | 1615-0023 |
| <b>I-485 Supplement B</b> | NACARA Supplement to Form I-485 Instructions                                                   | 1115-0221 |
| <b>I-485C</b>             | HRIFA Supplement to Form I-485                                                                 | 1615-0024 |



|                           |                                                                                   |           |
|---------------------------|-----------------------------------------------------------------------------------|-----------|
| <b>I-485 Supplement E</b> | Instructions for I-485, Supplement E                                              | 1615-0023 |
| <b>I-515</b>              | Deficiency Notice to Arriving F-1, M-1, or J-1                                    | 1615-0003 |
| <b>I-526</b>              | Immigrant Petition by Alien Entrepreneur                                          | 1615-0026 |
| <b>I-5260</b>             | Request Determination that Prospective Immigrant Is an Investor                   | 1615-0026 |
| <b>I-539</b>              | Application to Extend/Change Nonimmigrant Status                                  | 1615-0003 |
| <b>I-5390</b>             | Application to Extend Temporary Stay                                              | 1615-0003 |
| <b>I-539PP</b>            | Premium Processing                                                                | 1615-0003 |
| <b>I-600</b>              | Petition to Classify Orphan as an Immediate Relative                              | 1615-0028 |
| <b>I-600A</b>             | Application for Advance Processing of Orphan Petition                             | 1615-0028 |
| <b>I-601</b>              | Application for Waiver of Grounds of Inadmissibility                              | 1615-0029 |
| <b>I-601A</b>             | Application for Provisional Unlawful Presence Waiver                              | 1615-0123 |
| <b>I-612</b>              | Application for Waiver of Foreign Residence Requirement of Sec. 212(e) of the INA | 1615-0030 |
| <b>I-643</b>              | HHS Statistical Data for Refugee/Asylee Adjusting Status                          | 16150070  |
| <b>I-687</b>              | Application for Status as a Temporary Resident under Sec. 245A of the INA         | 1615-0090 |
| <b>I-690</b>              | Application for Waiver of Grounds of Inadmissibility                              | 1615-0032 |
| <b>I-694</b>              | Notice of Appeal of Decision                                                      | 1615-0034 |
| <b>I-695</b>              | Application for Replacement of Form I-688a or I-688                               | 1615-0034 |
| <b>I-698</b>              | Application to Adjust Status from Temporary to Permanent Resident                 | 1615-0035 |
| <b>I-730</b>              | Refugee/Asylee Relative Petition                                                  | 1615-0037 |
| <b>I-751</b>              | Petition to Remove Conditions on Residence                                        | 1615-0038 |
| <b>I-765, I-765WS</b>     | Application for Employment Authorization                                          | 1615-0040 |



|                                  |                                                                                                                                                                                  |           |
|----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|
| <b>I-765V</b>                    | Application for Employment Authorization for Abused Nonimmigrant Spouse                                                                                                          | 1615-0040 |
| <b>I-817</b>                     | Application for Family Unity                                                                                                                                                     | 1615-0005 |
| <b>I-821</b>                     | Application for Temporary Protected Status                                                                                                                                       | 1615-0043 |
| <b>I-821D</b>                    | Consideration of Deferred Action for Childhood Arrivals                                                                                                                          | 1615-0124 |
| <b>I-824</b>                     | Application for Action on an Approved Application or Petition                                                                                                                    | 1615-0044 |
| <b>I-829</b>                     | Petition by Entrepreneur to Remove Conditions                                                                                                                                    | 1615-0045 |
| <b>I-864</b>                     | Affidavit of Support under Section 213A of the Act and Notification of Reimbursement of Means-Tested Benefits                                                                    | 1615-0075 |
| <b>I-864A</b>                    | Contract between Sponsor and Household Member                                                                                                                                    | 1615-0075 |
| <b>I-864EZ</b>                   | Affidavit of Support Under Section 213A of the Act                                                                                                                               | 1615-0075 |
| <b>I-864W</b>                    | Intending Immigrant's Affidavit of Support Exemption                                                                                                                             | 1615-0075 |
| <b>I-865</b>                     | Sponsor's Notice of Change of Address                                                                                                                                            | 1615-0076 |
| <b>I-905</b>                     | Application for Authorization to Issue Certification for Health Care Workers                                                                                                     |           |
| <b>I-907</b>                     | Request for Premium Processing Service                                                                                                                                           | 1615-0048 |
| <b>I-912</b>                     | Request for Fee Waiver                                                                                                                                                           | 1615-0116 |
| <b>I-914</b>                     | Application for T Nonimmigrant Status; Application for Immediate Family Member of T-1 Recipient; and Declaration of Law Enforcement Officer for Victim of Trafficking in Persons | 1615-0099 |
| <b>Form I-914, Supplement A</b>  | Application for Immediate Family Member of T-1 Recipient                                                                                                                         | 1615-0099 |
| <b>Form I-914, Supplement B,</b> | Declaration of Law Enforcement Officer for Victim of Trafficking in Persons                                                                                                      | 1615-0099 |
| <b>I-918</b>                     | Application for U Nonimmigrant Status Application for U Nonimmigrant Status; Application for Immediate Family Member of U-1 Recipient; and U                                     | 1615-0104 |



|                                 |                                                                 |           |
|---------------------------------|-----------------------------------------------------------------|-----------|
|                                 | Nonimmigrant Status Certification                               |           |
| <b>Form I-918, Supplement A</b> | Petition for Qualifying Family Member of U-1 Recipient          | 1615-0104 |
| <b>Form I-918, Supplement B</b> | U Nonimmigrant Status Certification                             | 1615-0104 |
| <b>I-929</b>                    | Petition for Qualifying Family Member of a U-1 Nonimmigrant     | 1615-0106 |
| <b>N-400*</b>                   | Application for Naturalization                                  | 1615-0052 |
| <b>N-470*</b>                   | Application to Preserve Residence for Naturalization            | 1615-0056 |
| <b>N-565*</b>                   | Application for Replacement Naturalization/Citizenship Document | 1615-0091 |
| <b>N-600*</b>                   | Application for Certificate of Citizenship                      | 1615-0057 |
| <b>N-600K</b>                   | Application for Citizenship                                     | 1615-0087 |
| <b>N-644*</b>                   | Application for Posthumous Citizenship                          | 1615-0059 |

\*The N-Series forms are receipted in CLAIMS 3 before being moved to the Computer Linked Application Management System (CLAIMS 4.)



## Appendix B

### Tools and methods used to prioritize cases

USCIS offices use various tools and methods to prioritize cases for review. This includes:

#### ***California Service Center (CSC)***

- The Center Activity Tracking System (CATS) is used to report on the activities and productivity of the CSC. The system operates by allowing employees to track their work activities and production over the course of a day.
  - The Premium Processing Alert (PP Alert) provides a reminder email to the adjudicator assigned to a file as well as his or her supervisor. Noting that the premium processing files are to be adjudicated in 15 days or less, an email alert is sent to the officer and supervisor starting on the 10th day and continues until the file has a final adjudicative decision. The application provides the receipt number, officer assigned, officer's supervisor, NFTS location, and telephone number.

#### ***Texas Service Center***

- The Correspondence Handling and Management Planning System (CHAMPS) uses CLAIMS 3 data extracts to manage and monitor case workloads. CHAMPS provides reporting capabilities to identify 'ready to work' cases and to track cases throughout the adjudication process.<sup>59</sup>

#### ***Vermont Service Center***

- In order to track pending cases, a designated VSC employee runs a query of CLAIMS 3 replicated data from the VSC servers to identify cases that are 15 days old and notifies the adjudicator assigned to the case.

#### ***Nebraska Service Center***

- Using SMART, adjudicators pull information from CLAIMS 3 to identify what cases are still pending on "X" day and then locates the file using NFTS.
- A large portion of cases adjudicated at the NSC are Employment-Based Filings. To efficiently manage Employment-Based Filings the NSC created a locally – developed application, known as the EB Database. The EB Database is used daily by the NSC to identify and efficiently account for principal applicants and their dependent family members. These Employment-Based Filing applicants must be processed for security checks and prepared for adjudication in a timely manner.

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<sup>59</sup> See DHS/USCIS/PIA-012 - Correspondence Handling and Management Planning System (CHAMPS), available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

The EB Database also tracks cases that cannot be adjudicated to completion due to unavailability of visas from the Department of State, and must be pre-adjudicated and held until a visa becomes available.



## Appendix C

### Systems used to support automated adjudication

These systems include, but are not limited to:

- System Electronic Registration Approval (SERA), used by the CSC, to electronically organize and review incoming Temporary Protected Status (TPS) re-registration filings. SERA access TPS re-registration cases from CLAIMS 3, validates each application, and categorizes cases for automatic approval or manual adjudication.<sup>60</sup>
- Center Adjudication System Electronic Processing (CasePro), used by the Vermont Service Center, which electronically organizes and reviews incoming TPS, Deferred Enforced Departure (DED), and Deferred Action for Childhood Arrivals (DACA) filings, identifies approvable cases, automates the adjudication of some cases which meet filing requirements, and routes filings requiring additional review to the manual resolution process.<sup>61</sup>

These electronic case management systems either retrieve data directly from CLAIMS 3 or eCISCOR.

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<sup>60</sup> See DHS/USCIS/PIA-058 System Electronic Registration Approval (SERA), available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

<sup>61</sup> See DHS/USCIS/PIA-040 Center Adjudication System Electronic Processing (CasePro) available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).



## Appendix D

### CLAIMS 3 Minor Applications

| Application Name                             | Function                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Type of Information                    | Location              | PIA                     |
|----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|-----------------------|-------------------------|
| Marriage Fraud Amendment System (MFAS)       | MFAS is a module of CLAIMS 3 MF comprised of an application and IDMS database. MFAS supports and maintains casework for petitions for Legal Permanent Residency by aliens who have previously been granted Conditional Permanent Residency under the terms of the Marriage Fraud Amendment, including entrepreneurs. MFAS facilitates the adjudication and notification process for this program.                                                                                                                                                                       | Case Processing and Status information | Enterprise-wide       | CLAIMS 3 PIA            |
| Fingerprint Processing Mainframe (FD-258 MF) | Citizenship and Immigration Services requires that the Federal Bureau of Investigation (FBI) conduct a criminal background investigation on any alien applying for immigration benefits. FD-258 MF maintains information on individual applicants' fingerprint status. Each record contains applicant information that was sent to the FBI, such as Name, Birth Date, and other biographical data, as well as Date Fingerprinted and Date Sent to FBI. The records also contain other information received from the FBI such as FBI Process Date and FBI Search Result. | Fingerprint Check Results and Status   | Enterprise-wide       | CLAIMS 3 PIA            |
| Adjustment of Status (AOS) Scheduler         | The AOS Scheduler provides a means of managing client interviews and appointments for the CLAIMS Benefit systems. It has two distinct functions that are supported by a User and a Processor Version. The User Version is used to schedule and de-schedule interviews at the workstation. The Processor Version generates a text file to upload to the CLAIMS 3 MF and CLAIMS 4.                                                                                                                                                                                        | Schedules                              | NBC                   | CLAIMS 3 PIA            |
| Automated Premium Processing LAN e-mail      | APPLES is used to create and send e-mail notices to petitioners. It                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Notices (receipt, approval, and        | CSC, NSC, TSC and VSC | Benefit Decision Output |



|                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                |                             |                            |
|--------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|-----------------------------|----------------------------|
| System (APPLES)                                                          | relies on Premium Processing information in CLAIMS 3 LAN System. Three types of notices are created and sent: a receipt notice, an approval notice, and a reminder notice.                                                                                                                                                                                                                                                                                                                                                         | reminder)                                      |                             |                            |
| Biometric Retrieval Utility (BRU) Gateway                                | BRU Gateway hosts Biometric Retrieval Unit Interface to BBSS, the EFI interface to E-Filing, and the ESB interface to Lockboxes for LIFEAct and FBASI.                                                                                                                                                                                                                                                                                                                                                                             | Host interface                                 | CSC, NBC, NSC, TSC and VSC  | Benefit Decision Output    |
| Customer Relationship Information System Interface<br>(CRIS - Interface) | CRIS – Interface replaces the IVRS Interface that extracts status updates from CLAIMS 3 LAN System Pervasive database.                                                                                                                                                                                                                                                                                                                                                                                                             | Case Status updates and associated time stamps | CSC, NBC, NSC, TSC and VSC. |                            |
| Family-Based Adjustment of Status Interface (FBASI)                      | <p>FBASI is a system solution that provides the capability to process Extensible Markup Language (XML) files sent by File Transfer Protocol (FTP) from the Chicago Lockbox (CLB) FTP server and transfer the information to the CLAIMS 3. FBASI provides an efficient method of transferring data entered by the Bank into CLAIMS3 for further processing.</p> <p>The transfer is a daily process between the Bank and USCIS that adheres to strict protocols. This ensures that data is not re-entered, which reduces errors.</p> | Adjustment of status data                      | CSC, NBC, NSC, TSC and VSC  | Benefit Intake and Receipt |
| Travel Document Printing System (TDPS)                                   | This subsystem provides for the management and printing of travel-related documents. Three standard USCIS workstations and four printers are provided. There are six roles for processing travel documents: Quality Assurance Analyst, Printer Operators, Destroyer, Destruction Verifier, Supervisor, and Administrator.                                                                                                                                                                                                          | Travel-related documents                       | NSC                         | Benefit Decision Output    |
| Travel Document Printing System-PUSH (TDPS-PUSH)                         | This subsystem provides for the management and printing of travel-related documents. This subsystem is the Push Facility for TDSP.                                                                                                                                                                                                                                                                                                                                                                                                 | Travel-related documents                       | NSC                         | Benefit Decision Output    |
| Interim IBIS                                                             | This subsystem allows the use of                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Receipt Numbers                                | CSC, NSC, TSC               |                            |



|                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                |                                                                                     |                         |
|--------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|-------------------------|
|                                                                                | Receipt Numbers to track all IBIS Checks. The data is extracted by importing CLAIMS 3 LAN extracts into the Interim IBIS database; it then exports the IBIS EDITRANS Batches from the Interim IBIS database to create BLT inputs using EDITRANS.                                                                                                                                                                                                                                                                                                               |                                                                                                                                | and VSC                                                                             |                         |
| Enterprise Print Manager Service (EPMS)                                        | <p>To support notice/document production for the Transformation Program, by producing physical documents, i.e., Cards, Travel Documents or Paper.</p> <p>The 7 EPMS Application Servers (2 in DC1-Production, 2 in DC1-Staging, 2 in TECC TEST and 1 in TECC DEV) uses Windows' built-in service Task Scheduler to create a task to run a PowerShell script to restart the EPMS agents at midnight each day to retrieve messages for processing. EPMS uses the Service Account and allow Windows Credential Manager to store the users password encrypted.</p> | Cards and Travel-related documents                                                                                             | Data Center One (DC-1)                                                              | Benefit Decision Output |
| Interim Case Management Solution (ICMS)                                        | ICMS supports an interim process for adjudication, building a custom Web-based interface to the Computer Link Application Information Management System 3 (CLAIMS 3) Local Area Network (LAN) via the USCIS Intranet to update cases with information from the adjudication decision.                                                                                                                                                                                                                                                                          | Adjudications information, including final approval or denial information, for family-based adjustment of status applications. | National Benefits Center (NBC) only                                                 | CLAIMS 3                |
| Refugee, Asylum, and Parole System Employment Authorization Document (RAPSEAD) | Provides the capability to request and print Employment Authorization Document (EAD) cards for Refugee, Asylum, and Parole System (RAPS) cases by importing RAPS data into the Computer-Linked Application Information Management System (CLAIMS) Local Area Network (LAN) database.                                                                                                                                                                                                                                                                           | RAPS Card Requests                                                                                                             | Nebraska Service Center (NSC) only                                                  | Benefit Decision Output |
| Document Services Management System (DSMS)                                     | DSMS provides tracking activities associated with version control, serialized items that will reduce costs, and introduce greater efficiencies to the USCIS printing supply chain. DSMS does not                                                                                                                                                                                                                                                                                                                                                               | Inventory                                                                                                                      | Transformation Engineering Consolidation Center (TECC), Eastern Forms Center (EFC), | Benefit Decision Output |



|               |                                                                                     |                                         |                            |                         |
|---------------|-------------------------------------------------------------------------------------|-----------------------------------------|----------------------------|-------------------------|
|               | transmit or receive any data from CLAIMS 3 LAN or any of its subsystems.            |                                         | Western Forms Center (WFC) |                         |
| I-512 Program | Access query developed to print Travel Documents which are mailed to the applicant. | Access query and print Travel Documents | Nebraska Service Center    | Benefit Decision Output |