

Privacy Impact Assessment Update for the

myUSCIS Account Experience

DHS/USCIS/PIA-071(a)

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Abstract

U.S. Citizenship and Immigration Services (USCIS) operates myUSCIS Account Experience, a personalized online environment that helps individuals navigate the immigration process. Through myUSCIS, individuals are able to establish an online account to electronically manage their account and profile, file immigration request forms, access submitted and USCIS-generated documents, and view case status information. myUSCIS Account Experience is being updated to: (1) employ the use of data streaming services to interface with other USCIS information systems; (2) interconnect with the Computer Linked Application Information Management System 3 (CLAIMS 3), GLOBAL (not an acronym), and Investor File Adjudication Case Tracker (INFACT) case management systems; (3) include the electronic submission of additional USCIS forms; (4) interface with the Content Management Services (CMS); and (5) use the Profile Manager to manage the profile for all myUSCIS account holders. This PIA evaluates the privacy risks and mitigations associated with these updates to the collection, use, and maintenance of personally identifiable information (PII).

Overview

U.S. Citizenship and Immigration Services (USCIS) is the component of the Department of Homeland Security (DHS) that oversees lawful immigration to the United States. USCIS' mission includes receiving and adjudicating a wide variety of immigration and non-immigration benefits and requests ("immigration requests"). USCIS historically operated under a paper form intake process requiring USCIS adjudicators to use a variety of case management systems to adjudicate benefit requests and issue written notices. USCIS is moving from a paper-based environment to a digital environment—in which filing, adjudication, and communication are all electronic. USCIS is continuously striving to expand opportunities for individuals to further engage with USCIS in a secure online environment as part of its mission.

USCIS established myUSCIS Account Experience to offer immigration requestors and legal representatives (account holders) a secure digital environment for a personalized and seamless immigration experience. Through myUSCIS Account Experience, individuals are able to create an authenticated and secure account to securely use various digital services that support the immigration request process and allow access to pending case information. Secure online accounts also allow individuals to manage their account, profile, and case information with USCIS.

myUSCIS Account Experience offers the following six core digital services along with several supporting functions and capabilities:

1. Onboarding allows account holders to establish a secure account with USCIS.

2. Account Home serves as the central location for account holders to manage their case with USCIS. Account holders are able to save information throughout the request filing process



and return at a later time to submit or delete their draft case. Account holders who successfully submit their case are able to manage their active cases from the beginning until the end.

3. **Digital Forms** allows account holders to electronically file applications and petitions. The digital immigration request forms collect the same information as the corresponding paperform. Prior to initiating the request, USCIS provides the account holder with a Privacy Notice covering the particular immigration request at the time of that collection. The immigration request forms and service types are dynamic, meaning that questions dynamically expand or become disabled as the account holder progresses through the request.

4. **Case Activity** offers a holistic view of a single case as well as a view into an account holder's full immigration history with USCIS. The Case Activity modules notify the account holder of major milestones such as receipt of an immigration request form or upcoming biometric and interview appointments. Case updates associated with a receipt number are sent electronically on a daily basis to myUSCIS Account Experience.

5. **Document Center** serves as a repository of documents and notices specific to the account holder that are integral to the immigration process. Account holders are able to upload and view evidence submitted in support of an electronically-filed or paper-filed application or petition and reuse evidence submitted previously for new forms or USCIS requests.

6. **Secure Messaging** provides access to live assistance within the account. This secure online account allows account holders to manage their account, profile, and case information with USCIS.

Together, these modules provide individuals with a cohesive and seamless experience with USCIS.

Reason for the PIA Update

Historically, legacy Immigration Naturalization Service (INS) and USCIS handled immigration requests in a purely paper world. Applicants, petitioners, and other immigration related requestors ("immigration requestors") mailed paper forms to designated physical addresses or P.O. boxes. Any supporting evidence or supplements to an immigration request similarly had to be submitted by mail or delivered in-person. USCIS stored submitted material in a physical file associated with the individual, known as an Alien File (A-File). Immigration requests were reviewed and adjudicated on paper, and any requests for additional evidence, decision notices, or other materials associated with the adjudication of immigration requests had to be physically mailed, receipted, and stored. More recently, technological advances in the breadth and quality of digital solutions have created more efficient and convenient alternatives to traditional paper methods for handling immigration requests.



USCIS is modernizing its administration and adjudication of immigration requests through electronic processing (hereinafter referred to as eProcessing).¹ eProcessing encompasses the electronic submission, adjudication, communication, and all practices and procedures associated with the paperless processing of immigration requests or other documents submitted to USCIS.² USCIS is currently in the process of making all immigration request forms available for online filing and electronic processing. myUSCIS Account Experience supports the eProcessing initiative by making immigration requests forms available to account holders for electronic filing, as well as supporting the electronic engagement with USCIS.³

USCIS plans to adapt existing operational systems and integrate new services to enhance the processing of electronically filed immigration request forms. USCIS has historically built large systems that performed functions that were aligned with specific benefit types or operational directorates (e.g., Field Operations Directorate (FOD), Service Center Operations Directorate (SCOPS), Refugee, Asylum, and International Operations (RAIO)). These system were originally built to support the paper process for specific directorates, which has limited USCIS' ability to integrate systems within USCIS operations. As part of its modernization effort, USCIS is moving away from siloed benefit-specific systems to functionally-aligned services that holistically support USCIS operations. USCIS is integrating myUSCIS Account Experience with existing USCIS case management systems and other support systems to support the electronic processing and adjudication of electronically filed immigration requests.

Since the publication of DHS/USCIS/PIA-071, USCIS has made several updates to myUSCIS in support of eProcessing. Upon publication of this PIA, myUSCIS will (1) employ the use of data streaming services to interface with other USCIS information systems; (2) expand its support for the electronic submission of electronically filed immigration requests with connections to the Computer Linked Application Information Management System 3 (CLAIMS 3),⁴ GLOBAL⁵ (not an acronym), and Investor File Adjudication Case Tracker (INFACT) case management systems;⁶ (3) accept the electronic submission of additional USCIS forms;⁷ (4) interface with the Content Management Services (CMS)⁸ via the STACKS user interface to retrieve case-specific content maintained in the CMS; and (5) use the Profile Manager to create and manage an electronic profile for all myUSCIS account holders who successfully submit an immigration request.

¹ Immigration files currently in paper form will remain as such until an individual affirmatively requests an additional benefit or until the record is otherwise used in an administrative context.

² Proposed 8 CFR § 107.1(a))

³ Please see Appendix A for a full list for immigration request forms available for electronic filing.

⁴ See DHS/USCIS/PIA-016(a) Computer Linked Application Information Management System 3 (CLAIMS 3) and Associated Systems, *available at* <u>www.dhs.gov/privacy</u>.

⁵ See DHS/USCIS/PIA-027(a) Asylum Division, available at <u>www.dhs.gov/privacy</u>.

⁶ See EB-5 PIA, available at <u>www.dhs.gov/privacy</u>.

⁷ See Appendix B to view the list of USCIS forms available for electronic submission.

⁸ See CMS PIA, available at <u>www.dhs.gov/privacy</u>.



Data Streaming Services

myUSCIS Account Experience is integrating with data streaming services⁹ to share data with applicable USCIS systems and eProcessing services. Data streaming services act as intermediary messengers to effectively and efficiently move data among USCIS systems in near real-time. The use of these services allows USCIS to transport data without the technical and administrative burden usually placed on the operating systems. myUSCIS Account Experience uses the data streaming services to route the submitted immigration requests to the correct case management systems or support system.

Once an immigration request is submitted via the myUSCIS Account Experience, myUSCIS places the encrypted data from the application on the data streaming service with an indicator that identifies the case management system or support system that will store the data. The applicable case management system or support system then receives the message and decrypts the application data for storage and case processing. The data streaming services provide high availability and resiliency for data and uses an event-driven design when events or changes to a source system trigger an update to the recipient system.

Case Management System Interfaces

Previously myUSCIS Account Experience replaced all aspects of the public-facing USCIS Electronic Immigration System (USCIS ELIS) and enabled the submission of a select number of USCIS forms. USCIS ELIS continues to serve as an internal electronic case management system for electronically filed immigration request forms. USCIS ELIS supports a series of processing and adjudication actions, such as case receipt and intake, biometric collection appointment generation, case specific processing and management, automated background checks, interview appointment scheduling, final decision rendering, and production of the proof of benefit. For each step in the process, USCIS ELIS sends updates with the latest case status to myUSCIS Account Experience to provide the immigration requestor with the latest status of the requestor's benefit filing.

USCIS is integrating myUSCIS Account Experience with other existing case management systems to expand the immigration request types that may be electronically filed with USCIS. myUSCIS Account Experience is being updated to include the following case management systems:

• **Computer Linked Application Management System 3 (CLAIMS 3)** is used to manage the adjudication process for most domestically-filed, immigration benefit filings with the

⁹ See Data Streaming Services PIA, available at <u>https://www.dhs.gov/privacy.</u>



exception of naturalization, intercountry adoption, and certain requests for asylum and refugee status.¹⁰

- **Global** (not acronym) is used to support the screening of individuals during the credible fear, reasonable fear, affirmative asylum,¹¹ defensive asylum,¹² and Nicaraguan Adjustment and Central American Relief Act (NACARA) processes. Global provides the means for tracking of asylum cases as they progress from application filing through final determination/decision or referral to the U.S. Immigration Courts.¹³
- **Investor File Adjudication Case Tracker (INFACT)** supports the case management needs in support of the FOD Immigrant Investor Program Office (IPO).¹⁴

A key aspect to the eProcessing initiative is the continual roll out of electronic immigration request forms until all USCIS forms are available for electronic submission via the myUSCIS Account Experience. Each form type is designated to a certain case management system. Electronically submitted immigration requests are routed to the applicable case management system (i.e., USCIS ELIS, CLAIMS 3, Global, and INFACT) after submission to myUSCIS Account Experience through the use of the data streaming services, ensuring that only the relevant cases are sent to each system. The data streaming services use a technical filter that allows only the immigration requests processed by a specific case management system to be available to that system.¹⁵ myUSCIS Account Experience does not retain the information that is sent to the case management system.

Similarly to USCIS ELIS, CLAIMS 3, Global, and INFACT are responsible for a series of case processing and adjudication actions, such as case receipt and intake, biometric collection appointment generation, case specific processing and management, automated background checks, interview appointment scheduling, final decision rendering, and production of the proof of benefit. For each step in the case management process, CLAIMS 3, Global, and INFACT update myUSCIS

¹³ See DHS/USCIS/PIA-027 USCIS Asylum Division, available at <u>https://www.dhs.gov/privacy</u>.

¹⁴ See EB-5 PIA, available at <u>www.dhs.gov/privacy</u>.

¹⁰ See DHS/USCIS/PIA-016(a) Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems, *available at* <u>https://www.dhs.gov/privacy</u>.

¹¹ USCIS is responsible for the administration and adjudication of the affirmative asylum applications. To obtain affirmative asylum, the individual must be physically present in the United States. An individual may apply for affirmative asylum status regardless of how he or she arrived in the United States or his or her current immigration status.

¹² A defensive application for asylum occurs when an individual requests asylum as a defense against removal from the United States. In defensive asylum cases, the individual is currently in removal proceedings in immigration court with the Department of Justice's Executive Office for Immigration Review (EOIR). Global requests ASC appointments, and initiates TECS (not an acronym) and Federal Bureau of Investigation (FBI) namechecks, which are background check procedures performed by the U.S. Customs and Border Protection (CBP) and FBI, respectively.

¹⁵ As new forms become available for electronic submission, USCIS will update Appendix B, and identify the designated case management systems, of this PIA.



Account Experience to share with the immigration requestor the latest case status of his or her electronically-filed immigration request.

Content Management Services

USCIS uses Content Management Services (CMS)¹⁶ to store all electronically filed immigration requests and evidence via myUSCIS Account Experience, and USCIS-generated correspondence created via Enterprise Correspondence Handling Online (ECHO).¹⁷ CMS is a back-end repository of all digital immigration-related content. CMS supports USCIS' storage and management of digital immigration-related content in support of intake, case adjudication, and records management. All documents are indexed using a unique identifier (i.e., receipt number) to associate filings and associated documents in CMS to a particular immigration content submitted including a copy of the immigration request form in its entirety as well as all associated supporting evidence and documentation by logging into their accounts. USCIS adjudicators are able to access the content related to a specific benefit request via a user interface called, STACKS, or through separate USCIS interconnected systems.

Profile Manager Service

myUSCIS Account Experience is integrating with the Person Centric Services (PCS) Profile Manager Service (hereafter referred to as *Profile Manager*) to manage the myUSCIS Account Experience user's profile data. The Profile Manager creates the user profile to store a limited amount of declared requestor or legal representative information. Profile creation occurs after an account holder successfully submits an immigration request via the myUSCIS Account Experience, the form has been paid for, and the case has become operationalized. myUSCIS Account Experience sends the profile information via the data streaming services to the Profile Manager.

After the submission of the request, a USCIS profile is created for the account holder and stored within the Profile Manager. The Profile Manager stores the following declared information submitted by the account holder:

- USCIS Receipt Number*
- First name
- Last name*
- Date of Birth*
- Physical address

¹⁶ See DHS/USCIS/PIA-079 Content Management Services, available at <u>www.dhs.gov/privacy</u>.

¹⁷ See DHS/USCIS/PIA-063 Benefit Decision and Output Processes, available at <u>https://www.dhs.gov/privacy</u>.

¹⁸ A person-centric model goes beyond simply associating case records to an individual. This model provides a consolidated view of an individual's entire immigration history through the digital content associated with his or her interactions.



- Mailing address*
- Alien Number
- Social Security number (SSN)
- Country of Birth
- Country of Citizenship
- Daytime phone number
- USCIS Account Number*

*denotes minimum fields required for the creation of a profile

Prior to submission of the immigration request, the account holder is able to review all of the information, including the data fields used to create a profile, which he or she will be submitting to USCIS for accuracy and completeness.

After the profile is created, the account holder can log into his or her myUSCIS account and view his or her profile information by clicking on the Profile Tab. The Profile displays the account holder's full name, date of birth, physical and mailing addresses, and daytime phone number. On this tab, the user can edit his or her physical address, mailing address, and daytime phone number. Updates are communicated to the Profile Manager and reflected back to the myUSCIS Account Experience account holder on the Profile Tab within the account.

To enable the applicable USCIS case management systems to receive a notification of the profile changes, the Profile Manager posts an encrypted notification to the data streaming service containing the updated information and the individual's Unique User ID. In addition, if an applicant submits an additional form, the Profile Manager uses the latest form information to update the profile. Any updates to the account holder's myUSCIS Account Experience account profile (i.e., physical and mailing addresses, and daytime phone number) only impacts the filing submissions processed through USCIS ELIS, CLAIMS 3, Global, and INFACT. Address changes made in the Profile Manager Service does not satisfy the INA requirement to keep addresses upto-date. Account holders are required to file a paper or electronic Form AR-11 in order to legally update their address with USCIS.

Privacy Impact Analysis

Authorities and Other Requirements

The authority to collect and use information, including SSN, does not change with this update. The authority to collect information is found within the Immigration and Nationality Act (INA), 8 U.S.C. §§ 1103, 1201, and 1255.

The information collected, used, maintained, and stored in myUSCIS Account Experience is covered under the following SORNs:



- DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records¹⁹ covers documentation and maintenance of an individual's immigration application, petitions, and requests as he or she passes through the U.S. immigration process;
- DHS/USCIS-007 Benefits Information System²⁰ permits USCIS' collection, use, maintenance, dissemination, and storage of paper and electronic benefit request information. This includes case processing and decisional data not included in the A-File SORN. It also covers case specific information that is collected and shared with online account holders;
- DHS/USCIS-010 Asylum Information and Pre-Screening System of Records²¹ covers the information collected during the ingestion of the I-589 and I-881 forms; and
- DHS/ALL-037 E-Authentication Records System of Records²² covers information collected to create and authenticate an individual's identity for the purpose of obtaining a credential to electronically access a DHS program or application.

This update does not change the Authority to Operate (ATO) for myUSCIS.

This update does not change the records schedule.

This update does not impact the Paperwork Reduction Act (PRA) requirements for the myUSCIS Account Experience. The OMB Control number for online account creation is 1615-0122 (there is no corresponding agency number). Each immigration request form or service type filed through myUSCIS Account Experience has an existing OMB Control number that covers the electronic information collection. An updated list is available in Appendix A and B.

Characterization of the Information

USCIS continues to collect the information outlined in Section 2.0 of the DHS/USCIS/PIA-071 myUSCIS Account Experience. This PIA update expands the immigration forms that may be submitted electronically. Information collected from each benefit request form or service type varies and not all forms collect the same information. Generally, immigration request forms collect biographic information about the immigration requestor, beneficiaries, legal representatives, interpreter, and preparer. A full account of what data is requested for each immigration benefit and service type may be viewed by referencing the forms associated with each immigration benefit or service type in Appendix A and B.

¹⁹ DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 82 FR 43556 (October 18, 2017).

²⁰ DHS/USCIS-007 Benefits Information System, 81 FR 72069 (October 19, 2016).

²¹ DHS/USCIS-010 Asylum Information and Pre-Screening System of Records, 80 FR 74781 (November 30, 2015)

²² DHS/ALL-037 E-Authentication Records System of Records, 79 FR 46857 (August 11, 2014).



This update does not impact the sources of information collected. USCIS continues to collect information directly from the immigration requestor and/or legal representative. Instead of solely collecting information via paper forms, USCIS is continuing its information collection efforts to include the electronic filing of additional forms via the myUSCIS online portal.

This update does not impact the use of information from commercial sources or publicly available data.

myUSCIS Account Experience continues to collect user profile, biographic information, and supplemental evidence directly from the account holder (i.e., individual or his or her representative); therefore, USCIS is dependent upon the accuracy of the information provided by the account holder. To ensure the accuracy and integrity of the information, account holders are provided with the opportunity to review and edit information prior to its submission.

<u>**Privacy Risk:**</u> myUSCIS Profile may capture outdated, inaccurate, irrelevant, or incomplete information through the electronically submitted forms.

Mitigation: This risk is mitigated because the account holder has the ability to review information included in his or her myUSCIS Account Profile prior to submission to USCIS and at any time after the profile has been created. USCIS account holders provide information to myUSCIS Account Experience directly to ensure accuracy of information. Prior to the submission of information, myUSCIS Account Experience provides the individual with an opportunity to enter biographic information, review its accuracy, and amend it. Information submitted by the legal representative requires the benefit requestor to review the filing prior to electronically signing the form. The benefit requestor is required to check a box attesting that he or she has reviewed the information. This ensures the accuracy and integrity of the benefit request form prior to submission.

In addition, after the information is submitted to USCIS and is added to the account holder's profile, the account holder may log into his or her myUSCIS account at any time to review the profile information and make any updates if necessary. Account holders can update the physical address, mailing address, and daytime phone number. Updating the physical and mailing address does not legally update their address with USCIS and does not update the official change of address systems. The updated profile information is then provided to the applicable case management system via the data streaming service.

<u>**Privacy Risk:**</u> There is a risk that by myUSCIS transferring information received on immigration request forms to multiple interconnected systems via the data streaming services it could lead to the inaccurate and untimely delivery of data to USCIS systems.

<u>Mitigation</u>: This risk is partially mitigated. USCIS transfers immigration request data to the case management systems (USCIS ELIS, CLAIMS 3, Global, and INFACT), which are the appropriate systems of record for this information. Any time information is updated, the update will be made in the case management system to ensure all changes are recorded at the authoritative



source of the data. Any requests for the immigration request data will be sent from the case management systems to ensure that the authoritative source is queried and correct information is provided.

<u>Privacy Risk</u>: There is a risk that inaccurate or incomplete data will be transferred from myUSCIS to the case management systems via the data streaming services.

<u>Mitigation</u>: This risk is mitigated. Previously, information was manually entered into each case management system from the immigration request form. With this practice, there was an increased risk of inaccurate data being captured and stored within these systems and that data relating to an immigration requestor could be different in different systems. USCIS mitigated this risk as best as possible through training, supervisor reviews, and ongoing quality assurance reviews. With this update, data is entered into myUSCIS directly from the immigration requestor and is then encrypted, transported, and delivered "as is" to the appropriate case management systems via the data streaming services, As appropriate, this system is responsible for reformatting and standardizing the representation of the data. This process ensures the data integrity from the intake of the information to the receipt of the information by the other system. The data streaming services continuously extracts, replicates, and loads myUSCIS information in real-time to keep that system data consistent with the data in myUSCIS. Since the data streaming service is continuously refreshing, it is able to identify changes and immediately update case management systems with the corrected information.

Uses of the Information

USCIS continues to use the information it collects from account holders in the same manner as outlined in Section 3.0 of the DHS/USCIS/PIA-071 myUSCIS Account Experience. USCIS is integrating myUSCIS Account Experience with existing USCIS case management systems and new support systems to enhance the overall immigration experience of the account holder. Account holders continue to manage their account and profile, electronically file benefit request forms, access submitted evidence and USCIS-generated documents, and view case status information through myUSCIS Account Experience. Access to the data stored in myUSCIS Account Experience, as well as the system, is limited to account holders (i.e., immigration requestors and legal representatives). There are no additional risks to the uses of information.

Notice

USCIS provides general notice to the public about system changes through this PIA update. USCIS continues to provide general notice to account holders through the publication of associated SORNs and through the USCIS website. Additionally, myUSCIS Account Experience provides a Privacy Notice prior to the submission of any information. The Privacy Notice notifies the account holder about the authority to collect the information requested, the purposes of collection, USCIS'



routine uses of the information, and the consequences of an account holder providing or declining to provide the information to USCIS.

<u>Privacy Risk</u>: There is a privacy risk that myUSCIS Account Experience account holders are unaware that the change of address functionality does not satisfy the legal requirement for the applicant, petitioner, or requestor to notify DHS of any change of address as required by section 254 of the INA.

<u>Mitigation</u>: This risk is partially mitigated. Individuals who currently have a myUSCIS Account Experience online account may submit their address changes in myUSCIS Account Experience for correspondence purposes only. myUSCIS Account Experience notifies individuals, while updating their profile, that they are also required to file a paper or electronic Form AR-11 in order to legally update their address with USCIS. This PIA also provides notice to file a separate Form AR-11 to satisfy section 254 of the INA.

Data Retention by the project

The records schedule does not change with this update. There are no additional risks to data retention.

Information Sharing

This PIA update does not impact the information sharing practices as outlined in Section 6.0 of the DHS/USCIS/PIA-071 myUSCIS Account Experience. There are no additional risks to information sharing.

Redress

This PIA update does not impact how access, redress, and correction may be sought from USCIS. myUSCIS Account Experience allows account holders to directly and securely engage with USCIS to obtain pertinent immigration case-related information. Account holders who created online accounts must authenticate their identity using the username, password, and authentication code. Once authenticated, individuals may access the information they used to create their profiles, such as name and address information, as well as the case specific information prior to official submission to USCIS.²³

Additionally, an individual seeking access to his or her information held by USCIS may continue to gain access to his or her records by filing a Freedom of Information Act (FOIA) or Privacy Act request. Individuals not covered by the Privacy Act may obtain access to records consistent with FOIA unless disclosure is prohibited by law or if the agency reasonably foresees

²³ The account creation and authentication process is discussed in DHS/USCIS-071 myUSCIS Account Experience, *available at www.dhs.gov/privacy*.



that disclosure would harm an interest protected by an exemption. Any account holder seeking access to his or her information should direct their request to the following address:

USCIS National Records Center (NRC) FOIA/PA Office P.O. Box 648010 Lee's Summit, MO 64064-8010

Further information for Privacy Act and FOIA requests for USCIS records can also be found at <u>http://www.uscis.gov</u>. U.S. citizens and lawful permanent residents may correct information by filing a Privacy Act Amendment. U.S. citizens and lawful permanent residents should submit requests to contest or amend information contained in USCIS systems. Individuals not covered by the Privacy Act are also able to amend their records. If an individual finds inaccurate information in his or her record received through FOIA, he or she may visit a local USCIS Field Office to identify and amend inaccurate records with evidence. There are no additional risks to redress.

Auditing and Accountability

USCIS ensures that practices stated in this PIA comply with federal, DHS, and USCIS standards, policies, and procedures, including standard operating procedures, rules of behavior, and auditing and accountability procedures. myUSCIS Account Experience is maintained in the Amazon Web Services (AWS), which is a public cloud designed to meet a wide range of security and privacy requirements (e.g., administrative, operational, and technical controls) that are used by USCIS to protect data in accordance with federal security guidelines.²⁴ AWS is Federal Risk and Authorization Management Program (FedRAMP)-approved and authorized to host PII.²⁵ FedRAMP is a U.S. government-wide program that delivers a standard approach to the security assessment, authorization, and continuous monitoring for cloud services. USCIS employs technical and security controls to preserve the confidentiality, integrity, and availability of the data, which are validated during the security authorization process. These technical and security controls limit access to USCIS users and mitigate privacy risks associated with unauthorized access and disclosure to non-USCIS users. Further DHS security specifications also require auditing capabilities that log the activity of each user in order to reduce the possibility of misuse and inappropriate dissemination of information. All user actions are tracked via audit logs to identify information by user identification, network terminal identification, date, time, and data accessed. All USCIS systems employ auditing measures and technical safeguards to prevent the misuse of data.

²⁴ Public clouds are owned and operated by third-party service providers whereas private clouds are those that are built exclusively for an individual enterprise.

²⁵ <u>https://marketplace.fedramp.gov/#/product/aws-us-eastwest?status=Compliant&sort=productName.</u>



<u>**Privacy Risk:**</u> The data maintained by AWS for the purposes of cloud hosting may be vulnerable to breach because security controls may not meet system security levels required by DHS.

<u>Mitigation</u>: This risk is mitigated. USCIS is responsible for all PII associated with the myUSCIS Account Experience, whether on USCIS infrastructure or on a vendor's infrastructure and it therefore imposes strict requirements on vendors for safeguarding PII. USCIS strictly adheres to the DHS 4300A Sensitive Systems Handbook, which provides implementation criteria for the rigorous requirements mandated by DHS's Information Security Program.²⁶ USCIS cloud service providers must be FedRAMP-certified. By using FedRAMP-certified providers, USCIS leverages cloud services assessed and granted provisional security authorization through the FedRAMP process to increase efficiency while ensuring security compliance. All contracted cloud service providers must follow DHS privacy and security policy requirements. Before using AWS, USCIS verified through a risk assessment that AWS met all DHS privacy and security policy requirements. Further, all cloud-based systems and service providers are added to the USCIS Federal Information Security Modernization Act (FISMA) inventory and are required to undergo a complete security authorization review to ensure security and privacy compliance.

Responsible Official

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.

Jonathan R. Cantor Acting Chief Privacy Officer Department of Homeland Security

²⁶ See <u>https://www.dhs.gov/publication/dhs-4300a-sensitive-systems-handbook.</u>



Appendix A

Immigration Service Types Filed Online Through myUSCIS

Name of Immigration Service	OMB Control Number
USCIS Immigrant Visa Fee	1615-0122



Appendix **B**

Immigration Forms Filed Online Through myUSCIS²⁷

Form Number	Form Name	OMB Control Number	Case Management System
<u>G-28</u>	Notice of Entry of Appearance as Attorney or Accredited Representative	1615-0105	USCIS ELIS, CLAIMS 3, INFACT, GLOBAL
<u>I-90</u>	Replacement of Permanent Resident Card	1615-0082	USCIS ELIS
<u>N-400</u>	Application for Naturalization	1615-0052	USCIS ELIS
<u>N-336</u>	Request for a Hearing on a Decision in Naturalization Proceedings (Under Section 336 of the INA)	1615-0050	USCIS ELIS
<u>N-565</u>	Application for Replacement Naturalization/Citizenship Document	1615-0091	USCIS ELIS
<u>N-600</u>	Application for Certificate of Citizenship	1615-0057	USCIS ELIS
<u>N-600K</u>	Application for Citizenship and Issuance of Certificate Under Section 322	1615-0087	USCIS ELIS
<u>I-539</u>	Application to Extend/Change Nonimmigrant Status	1615-0003	CLAIMS 3
<u>I-589</u>	Application for Asylum and for Withholding of Removal	1615-0067	GLOBAL
<u>I-924</u>	Application for Regional Center Designation Under the Immigrant Investor Program	1615-0061	INFACT

²⁷ All USCIS Forms are *available at* <u>https://www.uscis.gov/forms</u>.



<u>I-924A</u>	Annual Certification of Regional Center	1615-0061	INFACT
<u>I-881</u>	Application for Suspension of Deportation or Special Rule Cancellation of Removal (Pursuant to Section 203 of Public Law 105-100 (NACARA))	1615-0072	GLOBAL
<u>I-130</u>	Petition for Alien Relative	1656-0012	USCIS ELIS
<u>I-765</u>	Application for Employment Authorization	1615-0040	USCIS ELIS