



**Privacy Impact Assessment Update
for the
Customer Relationship Interface System
(CRIS)**

DHS/USCIS/PIA-019(b)

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Abstract

The Department of Homeland Security (DHS) United States Citizenship and Immigration Services (USCIS) is updating the Privacy Impact Assessment (PIA) for the Customer Relationship Interface System (CRIS).¹ CRIS provides USCIS customers access to the status of their applications and petitions for immigration benefits and processing time information. The purpose of this update is to provide notice regarding e-Request, a new service that allows customers to create a service request via www.uscis.gov, and to update the description of Case Status Service Online (CSSO). USCIS is publishing this update because these modifications affect the collection, use, and storage of personally identifiable information (PII).

Introduction

The Department of Homeland Security (DHS) United States Citizenship and Immigration Services (USCIS) administers online services to provide greater accessibility to immigration-related information in an effort to improve the overall experience of its customers and promote transparency. USCIS offers a variety of services designed to expand customer access to pending case status information. Customers who wish to check on the status of a pending benefit are able to access this information over the Internet. USCIS implemented Customer Relationship Interface System (CRIS) to provide customers with accurate, up-to-date, and comprehensive information about their pending cases.

CRIS is a web-based application that provides specific information to USCIS staff internally through the Intranet and to customers through the Internet. There are four components to CRIS:

Customer Interface

1. **Case Status Service Online (CSSO)** provides status updates on pending immigration benefits applications and petitions to USCIS customers and their representatives.
2. **Change of Address Online (CoA)** allows a customer to meet the federally-mandated requirement that non-US citizens notify USCIS of any change of address by electronically submitting their Form AR-11, *Alien's Change of Address Card*.

USCIS Personnel Interface

3. **Customer Service Gateway** displays the appropriate scripts for answering a customer's question on the customer service representative's screen. These scripts assist call center support staff in explaining laws, regulations, and information about USCIS forms in response to customer questions.
4. **Service Request Management Tool (SRMT)** allows USCIS Customer Service staff to create service requests and direct them to Service Centers, local Field Offices, and Asylum Offices where the customer's application or petition is in process. Previous service requests could only be called into the USCIS National Customer Service Center (NCSC) and documented in SRMT by

¹ The DHS/USCIS/PIA-019 CRIS PIA, December 4, 2008, and DHS/USCIS/PIA-019(a) – CRIS Update, September 22, 2009, are available at www.dhs.gov/privacy.



USCIS call center personnel. DHS USCIS is updating the existing DHS/USCIS/PIA-019 CRIS PIA, first published on December 4, 2008, to describe e-Request, a new online inquiry tool that allows customers to create an electronic service request about pending cases via www.uscis.gov, and an additional collection of tracking information in CSSO.

Reason for the PIA Update

The purpose of this update is to describe e-Request, a new customer module, and to update the description of CSSO to include the process of tracking information in order to provide greater case accessibility.

e-Request Enhancement

CRIS added e-Request, an Internet interface open to the public for use in SRMT that allows customers to initiate service requests online for certain applications and petitions. Service requests were previously called into the USCIS NCSC and documented in SRMT by USCIS call center personnel. e-Request allows a customer to place an electronic service request with USCIS to: (1) inquire about the status of his or her application or petition, if it is outside of the normal processing time; or (2) notify USCIS about an administrative error in a notice or document that he or she received from USCIS. Customers may inquire about any form that has surpassed posted processing times², or when an anticipated Application Support Center (ASC) appointment notice or other notice is pending.³ Customers may also submit a service request for a notice received from a Service Center with a typographical error.

Customer Interface

Customers are able to submit an online service request on a specific issue directly to USCIS through e-Request. Service requests are inquired by customers that cannot be immediately answered and require resolution by a USCIS service center or local office.

Typical issues include typographical errors on his or her immigration benefit documents, the non-receipt of information, change of beneficiary information, and cases not processed within USCIS stated processing times.⁴ Customers may use this tool to request the status of a pending benefit rather than calling the toll-free number or making an InfoPass appointment with the local office to obtain the same information.⁵ These requests generate high call volumes for relatively simple issues. e-Request reduces call volumes by allowing the customer to report an issue online and allows USCIS to more efficiently allocate its resources to address customer issues.

² USCIS has very specific processing goals for each type of application or petition. Processing times are an estimate of how long it will take to process a case from start to finish. Average processing times for all applications are posted at www.uscis.gov.

³ Application Support Centers, often called ASCs, offer fingerprinting services, usually after filing. ASCs provide fingerprinting services to support an application for an immigration benefit based on an appointment. Customers are notified about an ASC appointment by mail and should wait to receive the notice.

⁴ Examples of typographical errors may include misspelled or incorrect name, address, date of birth, country of birth, and A-Number.

⁵ InfoPass is an appointment system that allows the public to schedule in-person meetings with U.S. immigration officers at USCIS offices nationwide. Please see DHS/USCIS/PIA-046 Customer Scheduling and Services for more information, available at <http://www.dhs.gov/privacy>.



e-Request is available to customers through www.uscis.gov. To file an online service request, USCIS requires the customer to provide the following case information: receipt number⁶, form number, form type, date filed, and mailing zip code. e-Request validates the initial information provided by the customer against the data present in the customer's current database file in CRIS to determine if the customer's case is within or outside the normal processing times. Eligible customers then enter limited biographic, case filing, and contact information to complete the service request. e-Request collects the individual's name, date of birth, country of birth, country of citizenship, Alien Number (A-Number), filing date, the zip code, and customer contact information, such as email address, mailing address, or phone number to complete the service request. e-Request then generates a confirmation notice containing a system-generated confirmation number and message indicating that USCIS intends to respond within 30 days of the request filing date.⁷ If the customer already placed an online service request with USCIS, the system advises the customer to wait 30 days to contact USCIS to create another inquiry. Generally, USCIS responds to all requests within 30 days.

USCIS Personnel Interface

e-Requests then electronically forwards and assigns the online service request to the appropriate USCIS local office within SRMT.⁸ SRMT provides USCIS the ability to send the service request to the appropriate USCIS location for resolution and then to record the resolution of the issue by response letter, email, or telephone correspondence to the customer who reported the issue. Supervisory Immigration Information Officers (SIIO), who oversee staff within a specific office, use SRMT to identify all unassigned service requests associated with a specific office and assign them to an Immigration Information Officers (IIO). IIOs access the SRMT tool to respond to assigned service requests. SIIOs can reassign a service request to another IIO/SIIO or redirect the service request to another Field Office or Service Center.⁹

IIOs research each service request to identify the issue for resolution. Based on the outcome of his or her finding, the IIO creates a response letter to inform the customer of how his or her service request was resolved. All the responses between USCIS and the customer are stored in SRMT.

Case Status Service Online (CSSO) Update

USCIS uses the U.S. Postal Service (USPS) Priority Mail with Delivery Confirmation service to ensure the secure and timely delivery of Permanent Residency Cards (PRC), Travel Documents, Employment Authorization Documents (EAD), and other immigration documents.¹⁰ The USCIS Secure

⁶ USCIS assigns a receipt number for each application upon receipt according to when and where the application was received, form number, form type, date of filing, and mailing zip code.

⁷ Customers may resubmit a Service Request if USCIS does not meet the 30 day deadline.

⁸ SRMT tracks and handles customer service requests received through its 800 number, letters, online service request, and inquiries received at local offices from inception to completion.

⁹ There are times when a service request may be served better by another office or person. USCIS may reassign a service request for the following reasons: staff change, office location alignment, customer with disabilities, and office bandwidth.

¹⁰ Please contact the USPS Privacy Office for more information on the Delivery Confirmation Certification service.



Mail Initiative (SMI) system interfaces with USPS Delivery Confirmation Service to collect the location and delivery of immigration documents. USCIS is updating CRIS CSSO to collect tracking information for mailed documentation from the USCIS SMI system.

CSSO provides status updates on immigration benefit applications and petitions to USCIS customers and their representatives. Customers and their representatives may access CSSO via the Internet and enter their receipt number, which they received when they filed the application or petition. The receipt number is a unique confirmation number that USCIS provides the customer upon receipt of an application or petition for immigration benefits. After the user submits the receipt number, CSSO displays the status of the case – including USPS tracking information. With the USPS tracking information, USCIS customers can easily stay up-to-date on the delivery status of their documents and USCIS can confirm that these essential documents are delivered to the proper address.

CRIS interfaces directly with SMI. For changes in delivery status, SMI updates a record in the CRIS for subsequent display of the latest delivery status information in USCIS Case Status Online. The CSSO service queries the SMI database for those cases that have been updated with scan events from USPS since the last process time. The interface between SMI and CRIS is a one-way interface with SMI sending updates to CRIS.

Privacy Impact Analysis

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

The System and the Information Collected and Stored within the System

e-Request Enhancement

The information collected and stored has not changed with the e-Request enhancement. The information captured in SRMT during telephonic service requests is identical to the information captured in e-Request. With the e-Request enhancement, CRIS continues to collect application information, such as receipt number, form number, form sub type, date filed, limited customer biographic information, and contact information to create an online service request. The type of application or petition filed along with the type of issue the customer is reporting determines the information collected. e-Request only collects the minimum amount of information necessary to validate the person reporting the issue, uniquely identify the pending application or petition, generate a service request, and respond to the customer and his or her representative.

CSSO Update

SMI updates CRIS with the latest delivery status information of secure identity documents for display in CSSO. CSSO collects and stores USPS delivery status updates via predefined scan events in USPS Extract Files downloaded each day by SMI from a USPS server. Key information retained for each scan event is the USPS tracking number, scan event code, scan event date/time, and scan event location. The scan event code identifies USPS events -“picked up by USPS,” “processed at a USPS facility,” “delivered to addressee,” and “returned to sender.”



Uses of the System and the Information

e-Request Enhancement

There is no change in the use of data with this update. e-Request allows for the creation, fulfillment, routing, and tracking of service requests for pending applications and petitions through SRMT. This system provides customers and their representatives an additional method to submit service requests. Customers are able to create a service request online to report an issue, in addition to calling the NCSC. The information collected by e-Request is the minimum amount of information required for USCIS personnel to research the reported issue.

CSSO Update

There is no change in the use of data with this update. CSSO continues to provide status updates on immigration benefits applications, petitions, and identity documents to USCIS customers and their representatives. With this update, CSSO allows the user to check the delivery status of recently mailed items.

Retention

The approved National Archives and Records Administration (NARA) retention schedule [N1-566-08-09] has not changed with this update.

Internal Sharing and Disclosure

The internal sharing and disclosure of information has not changed with this update. USCIS will continue to share information with agencies internal to DHS as outlined in the DHS/USCIS/PIA-019 CRIS PIA and its corresponding updates.

External Sharing and Disclosure

The external sharing and disclosure of information has not changed with this update. USCIS will continue to share information with agencies external to DHS as outlined in the DHS/USCIS/PIA-019 CRIS PIA and its corresponding updates.

Notice

This PIA Update provides individuals notice of changes associated with CRIS. The DHS-USCIS-007- Benefits Information System (BIS) System of Records Notice (SORN), September 29, 2008, 73 FR 56596, continues to cover the collection, use, and disclosure of data. Additionally, USCIS provides Privacy Act Statements, as required by Section (e)(3) of the Privacy Act, prior to the collection of information. The Privacy Act Statement details the authority to collect the information, purpose for which the information collected, how the information is going to be used outside of the agency, and whether providing the information is mandatory.

Individual Access, Redress, and Correction

There are privacy enhancing changes to the access, redress, and record correction procedures because of this PIA Update. The enhancements allow individuals to directly engage with USCIS to amend an error in their application or check the status of their submission. If a FOIA or Privacy Act (PA)



concern arises, customers maintain the right to file a Freedom of Information Act (FOIA) and/or Privacy Act (PA) request to gain access to or amend their USCIS records. Any individual seeking to access information maintained in CRIS should direct his or her request to USCIS National Records Center (NRC), P.O. Box 648010, Lee's Summit, MO 64064-8010. This update creates no increased privacy impact.

Technical Access and Security

The technical access and security controls for CRIS have not changed with this update.

Technology

e-Request Enhancement

USCIS updated CRIS with a limited Internet interface to the SRMT called e-Request to automate the collection and processing of customer service requests. e-Request allows customers to initiate a service request online via www.uscis.gov. Service requests were previously called into the USCIS NCSC and documented in SRMT by USCIS call center personnel. All data communications associated with CRIS, including e-Request, are protected through multi-layer encryption technologies to ensure that only those authorized to view the data may do so and that the data has not been compromised while in transit.

CSSO Update

CRIS interfaces with SMI to collect the tracking and delivery status of identity documents. This exchange of information is conducted via an encrypted connection.

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Approval Signature

Original signed and on file at the DHS Privacy Office.

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