**Privacy Impact Assessment Update
for the**

Integrated Digitization Document Management Program (IDDMP)

DHS/USCIS/PIA-003(b)

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Abstract

The U.S. Citizenship and Immigration Services (USCIS) Integrated Digitization Document Management Program (IDDMP) digitizes paper-based immigration files (*e.g*., Alien Files (A-Files) and Receipt Files) and stores them in the Enterprise Document Management System (EDMS) for mission-related uses. EDMS enables USCIS to share immigration files more efficiently within the Department of Homeland Security (DHS) and with external agencies. USCIS is updating this PIA to: 1) discuss a new USCIS and Department of State (DoS) interface for transferring electronic A-File records to EDMS using the Immigrant Visa Content Service (IVCS); 2) the designation of IVCS as a backup contingency for viewing N-400 Receipt Files processed using USCIS Electronic Immigration System (USCIS ELIS);[1] and 3) the designation of IVCS as the electronic repository for the new Form I-131A adjudicated at international USCIS posts.

Overview

The Department of Homeland Security (DHS) U.S. Citizenship and Immigration Services (USCIS) is the custodian for the Alien File (A-File), 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. Although USCIS is the custodian of the A-File, USCIS, U.S. Customs and Border Protection (CBP), and U.S. Immigration and Customs Enforcement (ICE) create and use A-Files in the course of performing their mission requirements. Because the A-File is inherently paper-based, sharing the physical file is expensive, prone to handling errors, and difficult to share within and across DHS components.

USCIS originally developed the Integrated Digitization Document Management Program (IDDMP) to alleviate issues associated with sharing and updating the physical paper file by scanning and digitizing case files at numerous capture facilities including, Scan on Demand (SODA) at the USCIS National Records Center (NRC), USCIS Lockboxes, and the Records Digitization Facility (RDF).[2] USCIS discussed these types of ingestion methods in DHS/USCIS/PIA-003(a), published on September 24, 2013.

Since the 2013 PIA issuance, the scope of IDDMP has expanded to now include electronic ingestions from Department of State (DoS), the USCIS Electronic Immigration System (USCIS ELIS), and local scanning devices used by USCIS adjudicators.

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[1] *See* DHS/USCIS/PIA-056 USCIS ELIS *available at* www.dhs.gov/privacy.
[2] *See* DHS/USCIS/PIA-003(a) IDDMP PIA *available at* www.dhs.gov/privacy.

Reason for the PIA Update

USCIS is updating the DHS/USCIS/PIA-003(a), originally published on September 24, 2013, to now include electronic ingestions from DoS, USCIS ELIS, and local scanning devices used by USCIS adjudicators.

To implement these updates, USCIS created the Immigrant Visa Content Service (IVCS). IVCS is an interim repository for receiving, packaging, and delivering A-File content to EDMS. This process allows for USCIS to automatically and easily retrieve the immigrant's information from IVCS and ingest information into EDMS to create the applicant's electronic A-File.[3]

The following use cases represent the changes that have occurred to IDDMP as a result of this update:

<u>**DoS Ingestions**</u>

DoS issues immigrant visas (IV) to individuals wishing to live permanently in the United States, including individuals who are resettling in the United States as refugees. In general, to apply for an IV, a U.S. citizen relative, U.S. Lawful Permanent Resident (LPR), or a prospective employer, must sponsor the foreign citizen and must be the beneficiary of an approved USCIS petition.[4] After DoS approves the IV, and the individual enters the United States, he or she must indicate whether he or she intends to apply to become a LPR. If the visa recipient wishes to pursue becoming a LPR, as part of the USCIS adjudication process USCIS reviews all of the information collected from DoS as part of the visa process.[5] USCIS uses the information to assist in determining whether the applicant is eligible to adjust to LPR status.

The DHS/USCIS/PIA-003(a), describes four ingestion processes, including a one-time instance when DoS sent USCIS a server containing a large backlog of scanned IV files of individuals on the waitlist to receive a DoS visa. Under a new IV modernization initiative that USCIS plans to pilot in March 2017, DoS will share IV files with USCIS *electronically* via the IVCS. IVCS alleviates the need for DoS to transfer files to USCIS using a server containing a backlog of records, which USCIS and DoS originally intended to occur on a reoccurring basis.

With the implementation of IVCS, DoS's National Visa Center (NVC) scans USCIS approved petitions (Receipt Files), into the DoS Electronic Data Processing (eDP)[6] content storage

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[3] USCIS A-Files may exist in paper, electronic, or hybrid (both electronic and paper) form. Electronic A-Files may exist both in EDMS and USCIS ELIS.

[4] Once USCIS approves the petition, it assigns the immigrant visa petition a Priority Date and sends the petition to the DoS National Visa Center. DoS NVC then manages the case and provides further instructions to the applicants, and collects and reviews required documents and evidence.

[5] DoS may send the application, Affidavit of Support forms from sponsors, supplementary evidence, adjudicator notes, and any other information collected as part of the visa issuing process.

[6] *See* Electronic Data Processing (eDP), *available at* https://www.state.gov/privacy/c67206.htm.

server for immediate ingestion into IVCS, in which they are kept until fully adjudicated by DoS. The approved petitions scanned into eDP are referred to as "Gold Files." Upon scanning into eDP, NVC simultaneously sends the "Gold File" to DoS Consular Consolidated Database (CCD)[7].

DoS enabled CCD to transfer the visa vetting package to IVCS. This occurs when a visa is "revoked" at the discretion of USCIS, DoS renders a "final refusal" and DoS records the decision in CCD, or when DoS approves a visa and the immigrant arrives at a port of entry. The vetting package is comprised of final case decision information, complete metadata required to generate an A-File, and the supporting documents submitted to DoS and stored in CCD. The visa vetting package is enabled to automatically combine with the "Gold File" petition received earlier in the process to generate the complete A-File.

IVCS generates DoS content for ingestion into A-Files for approved, revoked, and refused petitions, and transfers them to EDMS as permanent records. Once transferred to EDMS, IVCS deletes the contents. If a DoS adjudication results in a "non-decision" of the IV case, in which a final decision could not be made (*e.g*., termination, adjustment of status, or non-electronic decision) an A-Number is not assigned and the "Gold File" is stored in IVCS. "Termination" cases are considered temporary records or Receipt Files per NARA guidelines and will remain in IVCS for ten years. Cases that result in Adjustments of Status or Non-Electronic Decisions and considered copies and are deleted from IVCS in two weeks from notification.

Finally, USCIS migrated the backlog data from the sever originally sent to USCIS from DoS, as described in DHS/USCIS/PIA-003(a), to IVCS to co-exist with the electronic information sent from eDP and CCD.

N-400/USCIS ELIS Backup Contingency

USCIS ELIS is an electronic case management system that allows USCIS to process certain immigration benefit requests. In the unlikely event an unexpected USCIS ELIS outage occurred during a scheduled naturalization interview, with the implementation of IVCS, this repository now serves as an alternative tool for viewing copies of N-400 receipt files.

To view the N-400's in the contingency repository, IVCS pulls encrypted USCIS ELIS N-400 petition copies from a cloud storage location currently in use by the Office of Transformation (OTC) and decrypts the files for local storage and viewing. A user can access this repository through the EDMS user interface using an "N-400" link within that application. When users click the link, EDMS directs the users to an N-400 viewing module within IVCS. USCIS is still negotiating on when the purge N-400 petition copies from IVCS, once the interview occurs.

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[7] *See* Consular Consolidated Database (CCD), *available at* https://www.state.gov/privacy/c67206.htm.

I-131A Receipt file Repository

USCIS Form I-131A, *Application for Travel Document (Carrier Documentation)* is used by USCIS to collect a fee for issuing carrier documentation to LPRs with a lost or stolen green card who want to re-enter the United States. USCIS plans to utilize IVCS by allowing international USCIS offices to scan the I-131A receipt petitions into IVCS, in lieu of creating paper files. This would alleviate the need to physically ship and store the petitions to records facility locations for the duration of the form's retention. Similar to the N-400 viewing module, EDMS users will be able to access the IVCS stored I-131A receipt petitions by clicking on an "I-131A" link within the EDMS application. Clicking on the link will take the user out of EDMS and into an I-131A viewing module of IVCS.

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.

Authorities and Other Requirements

USCIS continues to cover this collection of information by Section 290(a) of the Immigration and Nationality Act. The Office of Management and Budget (OMB) Memorandum M-12-18, "Managing Government Records Directive," also states that by 2019, all permanent records in federal agencies will be managed electronically to the fullest extent possible for eventual transfer and accessioning by NARA in an electronic format.

The Alien File, Index, and National File Tracking SORN,[8] continues to cover the collection, maintenance, and use of this information.

IVCS is a subsystem under EDMS, the primary information technology that supports IDDMP. USCIS approved EDMS for "ongoing" authorization status in August 2014. "Ongoing" authorization allows EDMS to be monitored continuously and remediated for security issues as needed. Monitoring happens through weekly and monthly web and database scans, as well as vulnerability monitoring and alerts.

IDDMP maintains data from USCIS applications and petitions that are covered by the Paperwork Reduction Act.

Characterization of the Information

USCIS continues to collect the information described in DHS/USCIS/PIA-003(a), including:

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[8] DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 76 FR 34233 (Nov. 21, 2013).

- Biographic information (name, date of birth, country of birth, A-Number, Social Security number, etc.);

- Vital documents (*e.g*., birth certificates, passports, marriage certificates);

- Biometric information (*e.g*., photographs, fingerprints);

- Enforcement supporting documents (*e.g*., rap sheets); and

- Other documents (*e.g*., naturalization certificates; tax returns; labor certifications; correspondence; court dispositions; interview notes).

IDDMP does not collect information directly from individuals. IDDMP digitizes information received through a paper process or from an external source, such as DoS. This PIA Update captures the process in which IDDMP will receive DoS immigration files electronically from eDP and CCD to ICVS, rather than manually. This PIA Update also captures how USCIS users may view N-400s and I-131As using ICVS now.

Uses of the Information

There are no new uses of this information resulting from this update, USCIS continues to use EDMS to view electronic A-Files. USCIS continues to share the petition with DoS to enable visa processing. Upon DoS issuing the visa, DoS shares the "Gold File" with USCIS' EDMS to enable USCIS to update the A-File and begin the LPR adjudication process. This process has shifted from a manual and paper-based process to a semi-manual and semi-automatic electronic process.

Once the A-File is created in EDMS using the DoS information, the uses of the information contained in EDMS are the same as the uses for the paper A-File and Receipt File. The copies of the N-400 and Form I-131A that are now viewable using EDMS are also used in accordance with existing uses. The information is used for immigration benefits processing, law enforcement, and protection of national security.

Notice

USCIS is providing notice about the change in the transmission of information to and from DoS enabled by the digitization of previously paper based information as well as making the N-400 and I-131As viewable in IVCS, through this PIA update. The Alien File, Index, and National File Tracking SORN remains unchanged with respect to the collection, maintenance, and use of this information.

Data Retention by the project

IVCS retains "Gold Files" according to the retention for receipt files, which is 10 years. Once the A-Files are transferred to EDMS, they are deleted after validation of successful ingestion.

USCIS is still negotiating how long to retain copies of the N-400 petitions in IVCS.

USCIS is currently in negotiations with NARA to retain the official copy of the Form I-131A receipt petition for a period of 6 years. Once the petition reaches the retention period, USCIS will delete the official copy of the Form I-131A.

USCIS continues to retain EDMS records permanently in accordance with the N1-566-08-17 retention schedule. Additionally, USCIS and DoS destroy the files sent between the agencies 14 days after being scanned into CCD in accordance with the N1-566-12-03 retention schedule. USCIS retains A-Files permanently and Receipt Files temporarily, in accordance with N1-566-08-11 and N1-05-96-1, respectively. GRS 4.3, item 20, governs the SODA Database, which allows USCIS to destroy records when no longer needed for administrative, legal, audit, or other operational purposes.

Information Sharing

There is no change in information sharing as a result of this PIA update. USCIS continues to share with and receive information from DoS. The only difference is that, DoS now electronically shares the visa information with USCIS via a connection between DoS eDP and DoS CCD and USCIS IVCS. Furthermore, the data from the sever originally sent to USCIS from DoS, as described in DHS/USCIS/PIA-003(a) will be migrated to IVCS and co-exist with the electronic information sent from eDP and CCD.

Redress

The individual right to access, redress, and correction has not changed with this update. Customers maintain the right to file a Freedom of Information Act (FOIA) request to gain access to or amend their USCIS records. U.S. Citizens, LPRs, and individuals with covered records under the Judicial Redress Act[9] may file a Privacy Act request to gain access or amend their data. Any individual seeking to access information maintained in the A-File and/or IDDMP should direct his or her request to USCIS National Records Center (NRC), P.O. Box 648010, Lee's Summit, MO 64064-8010.

Privacy Risk: There is a risk that non-immigrants will not be able to access or amend their records.

Mitigation: This risk is partially mitigated. Any individual, regardless of immigration status may file a request to access his or her information under FOIA. To the extent information is not exempt under FOIA, DHS is required to produce the information. In addition, prior to DHS making a determination to deny a benefit request, when appropriate, DHS will share the information with the individual and offer him or her the opportunity to address and correct the information.

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[9] Judicial Redress Act of 2015, Pub. L. 114-126, codified at 5 U.S.C. 552a note

Auditing and Accountability

There is no change in the auditing and accountability as described in the DHS/USCIS/PIA-003(a). USCIS continues to employ technical and security controls to preserve the confidentiality, integrity, and availability of EDMS and IVCS, which is validated as part of "ongoing" authorization. These technical and security controls mitigate privacy risks associated with unauthorized access and disclosure.

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Approval Signature

Original signed copy on file with the DHS Privacy Office.

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