

Form G-1595-001 NEW - Responses to 60-day FRN Public Comments

Public Comments (regulations.gov): [USCIS-2023-0017-0001](https://www.regulations.gov/document/USCIS-2023-0017-0001)

60-day FRN Citation (federalregister.gov): [88 FR 83956](https://www.federalregister.gov/documents/2023/12/01/88-fr-83956)

Publish Dates: December 1, 2023 – January 30, 2024

Comment #	Commenter ID	Comment	USCIS Response
1.		<p><b>Commenter: Justicia Lab</b> (See comments broken down as Items 1a. – 1c.)</p>	<p><b>NOTE:</b> The commenter uploaded a letter to regulations.gov at this link <a href="#">0003</a>. USCIS reviewed the three (3) recommendations provided in the letter and listed them as items 1a. – 1c. in this matrix so USCIS may easily review and if needed, address each recommendation. The letter also includes background about the commenter, Justicia Lab and can be reviewed at the link to the letter above.</p>
1a.	<a href="#">0003</a>	<p><u>Clarify Whether Separate Submissions Are Required for Each Application</u></p> <p>While Form G-1595 (API (Application Programming Interface) Production Access Request) is straightforward and user-friendly overall, we recommend additional instructions to better understand the intended purpose of the questions.</p> <p>“Part 1. Verification,” “Part 2. Contact Information,” and “Part 3. Information About Your Company or Organization” ask for information about the Organization and App. However, it is unclear if an Organization should complete the API request form for the organization or if it will need to complete the form for each application using the USCIS’ APIs.</p> <p>Citizenshipworks is one of several tools built by Justicia Lab that can benefit from leveraging USCIS’s API. We suggest that USCIS specify if an organization should complete separate forms for each tool/app that the organization intends to connect to USCIS’s API or if completing one form is sufficient for using USCIS’s APIs.</p>	<p><b>Response:</b></p> <p>As a security best practice, each application will require separate credentials. Each application can also be governed by separate terms and conditions, so each application will need to submit documentation separately. USCIS will modify the language accordingly.</p>
1b.	<a href="#">0003</a>	<p><u>Send Notifications to an API Endpoint</u></p> <p>“Part 3: Information About Your Company or Organization” asks the organization to provide a “Notification Email address for API Status updates (Required) (Question 4). It seems that should a status update about the API need to be shared, an email notification will be sent to the organization</p>	<p><b>Response:</b></p> <p>USCIS will consider this suggestion.</p>

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		directly; we also recommend the ability to receive the notification/status update via an API endpoint. Receiving these notifications via an API Endpoint will allow us to display within the application that made the API call and more easily communicate with our users.	
1c.	<a href="#">0003</a>	<u>Clarify Timing of User Consent to Changes in Privacy Policy and Terms of Service</u> “Part 5. Requirements for Privacy and Terms of Service: <i>Privacy and Data Practices</i> ” list requirements asking the organization to “Specify that you will get active consent from users when changes are made to privacy policies and terms of service.” We commend the need to protect the privacy of all users and welcome further clarification regarding this requirement. We recommend that USICS provide further clarification as to whether users' active consent must be gathered before changes to privacy policies and/or terms of service are implemented.	<b>Response:</b> USCIS will modify the language to clarify.