



Privacy Impact Assessment
for the

Customer Scheduling and Services

DHS/USCIS/PIA-046(a)

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Abstract

The Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) provides customers the ability to schedule appointments with USCIS to discuss the specifics of their pending benefit request filing. Previously, two separate systems supported this function. The InfoPass system provided customers with the ability to schedule appointments and the Customer Management Information System (CMIS) assisted USCIS employees with the customer scheduling and management process. USCIS decommissioned the legacy InfoPass system and integrated the customer-side appointment scheduling capabilities into an InfoPass module within myUSCIS. USCIS integrated the internal customer scheduling and management process into National Appointment Scheduling System (NASS). MyUSCIS serves as the single web interface for customers while NASS supports internal scheduling management for InfoPass. USCIS continues to use the Customer Management Information System (CMIS) to issue all customers a queuing ticket when the customer is checking into his or her appointment. USCIS is updating and reissuing this Privacy Impact Assessment (PIA), originally published on March 25, 2014, to evaluate the privacy risks and mitigations associated with the collection, use, and maintenance of personally identifiable information (PII) provided by individuals requesting appointments with USCIS.

Overview

The Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) is responsible for the administration and adjudication of applications and petitions for all immigrant and non-immigrant benefits under the Immigration and Nationality Act.¹ While USCIS' core mission is to ensure the timely adjudication of benefits, a priority for USCIS is to streamline the processing of customer inquiries to improve the overall customer experience. USCIS enhanced and expanded various online customer-oriented services in an effort to promote transparency and accessibility to its operations.

USCIS receives and processes millions of benefit cases each year. Customers who apply for immigration-related benefits may have questions about immigration law, procedures, or specifics of their case that are best addressed by a trained Immigration Service Officer (ISO). Previously, customers seeking assistance from USCIS had to wait in long lines for a first-come, first-served in-person appointment. Generally, the number of customers seeking assistance exceeded the number of appointments available at a local field office causing many customers to make an additional trip back to the local field office.

InfoPass allows customers to schedule in-person appointments online at domestic and international USCIS Field Offices. USCIS provides customers the option to schedule an

¹ See 8 U.S.C. §§ 1101, 1103, 1201, 1255.



appointment through the my.uscis.gov website or at an USCIS domestic Field Office kiosk. Each Field Office continues to provide a kiosk to accommodate individuals without access to the internet to book an appointment. USCIS also continues to assist walk-in customers, but those with a scheduled appointment receive priority.

The legacy InfoPass system was previously a standalone system that did not interface or integrate with any other system. USCIS redesigned InfoPass to provide customers with a common look and feel for all online interactions. Online customers are now able to access InfoPass to schedule appointments through myUSCIS.² The InfoPass appointment management functionality, which was used by USCIS employees, was migrated into the National Appointment Scheduling System (NASS).³ As a component of NASS, InfoPass employs a new and responsive design that is more intuitive and easier to navigate for USCIS employees. NASS is the USCIS employee portal, while myUSCIS is the online portal for the public.

Appointment Creation

Online customers are able to schedule an appointment with USCIS from any computer or mobile device that is connected to the internet by going to www.uscis.gov or <https://my.uscis.gov> and clicking on the link to make an appointment. The InfoPass module guides online customers through several steps, including: finding a domestic or international field office, choosing an available appointment date and time, entering personal information, and confirming the appointment. To schedule an appointment, online customers enter their zip code or country (if the online customer is outside of the United States), into InfoPass. The module will locate the closest USCIS office.

The InfoPass module collects the following personally identifiable information (PII) from the online customer to complete the appointment process:

- Full Name (first, and last names are required; middle name is optional);
- Date of Birth (required);
- Telephone Number (required);
- Email Address (required for international offices only);
- Case Number (i.e., Alien Number (A-Number), Receipt Number, or USCIS Online Account Number); (required)
- Purpose of Visit (required for international offices only);
- Number of attendees (required for international offices only); and
- Name of attendees (required for international offices only).

² See DHS/USCIS/PIA-064 myUSCIS available at www.dhs.gov/privacy.

³ See DHS/USCIS/PIA-057 National Appointment Scheduling System available at www.dhs.gov/privacy.



For international appointments, USCIS must collect the names of all attendees to clear the U.S. Embassy or Consulate security clearance process.

The InfoPass module provides the online customer with an opportunity to enter, review, and amend biographic and appointment information prior to confirming the appointment. After the customer confirms the appointment, the InfoPass module generates an electronic appointment confirmation letter and the information is sent to NASS for management purposes. Customers are instructed to bring a print out of the letter and a government-issued photo ID to the appointment.

The appointment confirmation letter serves as the official appointment notice for the customer and contains the name of the customer; confirmation number (a system-generated serial tracking number assigned to the appointment); appointment date; appointment time; location; and personal identification number (PIN),⁴ which is a system-generated, random, five-digit code assigned to the appointment. For international appointments, the confirmation letter includes the names of each guest (i.e., interpreter, legal representative, and family members) attending the appointment with the customer. Many USCIS international offices are located at a U.S. Embassy or Consulate. Accompanying guest information is shared with and used by the U.S. Embassy or Consulate for security clearances purposes.⁵

Online customers can review and reprint a copy of their confirmation appointment letter from any computer or mobile device that is connected to the internet by going to <http://my.uscis.gov> and clicking on the 'manage an appointment' link. The customer then enters the same first name, last name, and date of birth used when the original appointment was made. A copy of the confirmation letter is displayed after clicking the 'Next' button. However, the 5-digit PIN number is not included on the duplicate copy for security purposes.

Online customers may also cancel or reschedule their appointments through the InfoPass module by selecting the 'manage an appointment' option. Customers are then prompted to enter the system-generated confirmation number and five-digit PIN printed on the original appointment confirmation notice to identify the confirmed appointment. Without the 5-digit PIN and the confirmation number, the customer is not able to cancel or reschedule their appointment unless he or she retrieves his or her appointment notice through the InfoPass module. To retrieve the appointment module the customer must provide his or her first name, last name, and date of birth. The customer then follows the step-by-step instructions to complete the appointment cancellation or rescheduling process.

Appointment Management

NASS serves as the centralized appointment scheduling system replacing the legacy

⁴ The 5-digit PIN is NASS-generated and passed through MyUSCIS. Customers use the system-generated confirmation number and PIN to cancel or edit an appointment with InfoPass.

⁵ See www.state.gov for additional information on U.S. Embassy or Consulate visits.



InfoPass scheduler component. NASS allows USCIS employees to manage appointment scheduling demands and better manage and allocate resources. NASS includes an InfoPass module that allows USCIS employees to allocate appointments to its respective Field Offices, as well as view daily, weekly, and monthly schedules for management purposes.

USCIS employees use the InfoPass module in NASS to identify available appointment slots for its respective Field Offices. When an online customer accesses the InfoPass module within myUSCIS to schedule an appointment, myUSCIS checks NASS to retrieve available date and times within a two week period to display to the customer. Once a customer successfully schedules an appointment, the customer's biographic and associated appointment information is sent to NASS for management purposes and the appointment slot is no longer available to other online customers.

Appointment Queuing

Upon arrival at a USCIS Field Office, a customer checks in for an appointment at a designated reception counter of the office. The customer presents the printed confirmation appointment notice and a government-issued photo identification document to the Reception Desk Officer operating the counter. The Reception Desk Officer enters the confirmation number from the appointment confirmation notice into NASS, which displays the information about the customer and appointment. If the appointment confirmation notice is not available, the Reception Desk Officer manually searches the day's appointments for a name and date of birth match in NASS. If there is not a match, the Reception Desk Officer treats the customer as a walk-in.

USCIS domestic Field Offices use the Customer Management Information System (CMIS) to issue all customers (both walk-ins and those with scheduled appointments) a queuing ticket while the customer is checking into his or her appointment. CMIS is a queuing system that prioritizes customers to ensure they receive service in a timely and efficient manner, and allows USCIS personnel to better track incoming customers chronologically. CMIS handles individual appointments, reception registration, and customer routing. CMIS also monitors customer flow through the Field Offices.

Each issued ticket is sequentially numbered to organize the queue flow of incoming customers by arrival time. To generate a queuing ticket, the following information is entered into CMIS: (1) confirmation number; (2) A-Number, USCIS Online Account Number, or Receipt Number; (3) appointment type; (4) appointment time; (5) zip code or country; and (6) number in the party. A CMIS-generated queuing ticket places the individual in a virtual line. The printed ticket includes the ticket number, the service category, and the time the ticket printed. Once a ticket is issued, USCIS directs the customer to the waiting area to be called for assistance.

The Immigration Service Officer (ISO) also uses CMIS to identify the next customer in the queue. The ISO uses the A-Number, USCIS Online Account Number, or Receipt Number to index



and retrieve notes recorded in CMIS from an applicant's prior visits, and to retrieve the individual's Alien File (A-File) and relevant case information prior to the appointment to better assist the customer with his or her specific inquiry. The ISO who completes the appointment makes appropriate notes within CMIS about the questions the customer asked and the responses given, and closes the ticket number at the end of the appointment. This information is used to better assist customers during future visits. USCIS time stamps each interaction from the moment the customer reports to the reception desk until the visit ends (e.g., waiting time, time spent with the agent). The ISO records all services provided to the customer during the visit in CMIS. USCIS does not use notes related to customer questions or inquires to make adjudicative benefit decisions.

Reporting

Authorized USCIS personnel are able to use NASS and CMIS to run a variety of customizable reports to monitor employee workload and office productivity in order to determine if resources are properly allocated. These reports can be run on a broad spectrum to measure productivity trends and average processing times. NASS and CMIS can also generate granular level reports to identify types, number, and status of appointments located in a particular office or assigned to a particular ISO.

Customer Satisfaction Assessments

Customer satisfaction with the appointment scheduling process is a priority for USCIS. myUSCIS, NASS, and CMIS are used to improve customer services and enhance operational efficiency. To ensure USCIS is meeting the needs of its customers and continuously improving its services, USCIS measures customer satisfaction through feedback cards, electronic surveys, and focus groups. A customer satisfaction assessment is an important tool in evaluating the level of satisfaction of all customers when using InfoPass and obtaining USCIS local field office services. Results from these assessments are used by USCIS to change and modify different aspects of USCIS and its office services to improve customer satisfaction.

Feedback Cards

Customer feedback cards are available in the customer service sections (e.g., the waiting area) of USCIS Field Offices where customers may choose to complete and leave a feedback card in a locked box. Completing the feedback card is completely voluntary. The customer service feedback cards are not related to the immigration application filed. The card relates to the customer's rating of USCIS Field Office customer service. The customer may choose to complete the feedback card anonymously, or include his or her name and/or phone number. Completion of the card is optional and offers the customer the opportunity to rate the service provided to him or her regarding the helpfulness of staff, courtesy of staff, accuracy of information given on past visits, and his or her satisfaction with the service received. Customers may rate the parameters as excellent, good, fair, or poor. USCIS uses the Field Operations Directorate Customer Service



Database (FOD CSDB) to record the results.

Electronic Surveys

USCIS extracts appointment and customer-related information from NASS to contact customers about electronic surveys (e-surveys). USCIS only emails e-surveys to customers who provided an email address. The purpose of the survey is to collect feedback from individuals about their experiences with online USCIS resources, such as online self-help tools available on the USCIS website and the appointment scheduling system. The survey is intended to collect opinion based responses from the individual, but also includes free text boxes that may capture USCIS employee PII. USCIS provides notice to the customer that the agency may use his or her email address to send follow up invitations to participate in voluntary e-surveys through the myUSCIS Privacy Notice.⁶ The survey is made available via a web link in the email invitation regarding customer satisfaction with USCIS. The e-survey is not mandatory and is completed by the individual anonymously. In the email invitations for the survey, customers are provided a notice with the purpose of the survey, instructions on how to complete the survey, and how to opt-out of future surveys. Four days after the initial invitation, an email reminder is sent to those individuals who have not yet responded. This is the last email these customers receive regarding the e-survey.

Focus Groups

USCIS conducts focus groups to solicit feedback from USCIS customers pertaining to their opinions and experiences when using USCIS services, such as the online appointment system and USCIS local office services. The objective is to assess customer satisfaction with USCIS services, and to solicit customer recommendations to improve these services. On behalf of USCIS, a contractor coordinates and conducts customer focus groups at professional focus group facilities, while a USCIS employee observes each focus group session.

To recruit respondents for the focus groups, USCIS randomly selects email addresses of USCIS customers from NASS whose local office matches the geographic location where the focus group will be conducted and uploads the respondents list into an excel file. USCIS provides notice to the customer that the agency may use his or her email address to send follow up invitations to participate in voluntary focus groups through the USCIS Privacy Notice.⁷ USCIS uploads the excel file of respondents into the designated Enterprise Collaboration Network (ECN) site for the contractor to access.⁸ The survey contractor operates under a USCIS contract that specifies that the survey contractor may only use customer provided information for specific survey purposes.

To recruit respondents for the focus groups, the USCIS contractor sorts the spreadsheet by USCIS local office and randomly selects the email addresses of the customers whose local office

⁶ See Appendix A of this PIA to view the myUSCIS Privacy Notice.

⁷ See Appendix A of this PIA to view the myUSCIS Privacy Notice.

⁸ The USCIS ECN is SharePoint, which is a document management and collaboration tool developed by Microsoft.



matches the geographic location where the focus group is to be conducted. In the invitation, customers are provided a notice with the purpose of the focus group, instructions on how to register, and how to opt-out of future surveys. Customers who are interested in participating in the focus group sessions respond to the request by email to register, and the contractor collects the customer's first name and phone number in ECN.

Prior to the focus group date, the survey contractor uses the customer's email addresses to send email invitations for the Focus Group. The contractor may also use the customer's email address or telephone number to confirm his or her participation. Once the focus group has been conducted, the survey contractor deletes all email addresses and telephone numbers associated with the specific focus group.

Individuals who volunteer to participate in a focus group session are advised that the information is used to determine customer perceptions regarding the services received by USCIS. The responses are anonymous. Responses to focus group questions from individuals are collected and retained through transcription services. These transcription documents do not include customer names or any other identifying information, but may include information about the USCIS employee who assisted the customer. A third party contractor on behalf of USCIS Customer Service and Public Engagement Directorate generates customer satisfaction reports from the responses. The responses are anonymous and aggregated. Once the focus group has been conducted, the survey contractor deletes all email addresses and telephone numbers associated with this specific focus group within 120 days of contact.

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?

Under Section 103(a) of the Immigration and Nationality Act, USCIS collects information to identify and communicate with applicants during the immigration benefits process and to provide a scheduling system directly accessible by the public to facilitate the convenient scheduling of required personal appointments.

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

The customer information in InfoPass, NASS, and CMIS, and for the customer satisfaction assessments is covered by the DHS/USCIS-007 Benefit Information System (BIS) System of Records Notice (SORN).⁹ The customer responses from the customer satisfaction assessments are anonymous and do not require SORN coverage because they are not linked to an individual and

⁹ DHS/USCIS-007 Benefit Information System, 73 FR 56596 (Sept. 28, 2008).



are not uniquely retrievable. The employee information in InfoPass, NASS, and CMIS is covered by the DHS/ALL-004 General Information Technology Access Account Records System (GITAARS) SORN.¹⁰

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

MyUSCIS was approved for operation on December 18, 2014, for a period of 36 months. The myUSCIS Authority to Operate (ATO) is set to expire on December 18, 2017. The myUSCIS Security Plan (SP) was updated on December 17, 2016.

NASS was approved for operation on April 10, 2014. NASS is part of the Ongoing Authorization (OA) for which the security posture is continuously monitored and tested. The NASS SP was updated on April 10, 2017.

CMIS was approved for operation on January 2, 2014. CMIS is part of the OA for which the security posture is continuously monitored and tested. The CMIS SP was updated on December 17, 2016.

Digital Innovation and Development – Information Technology (DID-IT) was approved for operation on January 2, 2014. FOD CSDB falls under the accreditation boundary as a minor application. DID-IT is part of the OA for which the security posture is continuously monitored and tested. The DID-IT SP was updated on December 17, 2016.

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

USCIS is negotiating a USCIS Appointment Scheduling Systems Retention Schedule to cover systems used to schedule appointments for biometrics, interviews in USCIS offices, and other appointments. This schedule will cover InfoPass, CMIS, and NASS. The proposed retention period is to delete and destroy no sooner than 10 years from the date of record creation. Once approved, the USCIS Appointment Scheduling Systems Schedule will supersede the NARA-approved CMIS Retention Schedule [N1-566-08-008], in which USCIS is set to delete and destroy records when no longer needed for agency business.

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.

¹⁰ DHS/ALL-004 - General Information Technology Access Account Records System, 77 FR 70792 (Nov. 27, 2012).



InfoPass is subject to the PRA requirements. OMB approved this collection under OMB Control Numbers 1615-0113. OMB also approved the collection of customer satisfaction data under OMB Control Number 1615-0121.

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.

Appointment Scheduling

InfoPass collects the following customer information to create an appointment:

- Customer first name (required);
- Customer middle name (optional);
- Customer last name (required);
- Customer date of birth (required);
- Customer phone number (required);
- Customer Zip Code;
- Customer email address (required for International appointments);
- Case number (i.e., Alien Number, Receipt Number, USCIS Online Account) (optional);
- Number of attendees (required for International);
- Name of attendees (required for International);
- Purpose of Visit (required International);

InfoPass generates an electronic appointment confirmation letter. The appointment confirmation notice contains the customer's name, appointment type, confirmation number, authentication code, appointment date, appointment time, location, and PIN. Customers use the system-generated confirmation number and PIN to cancel or make changes to an appointment with InfoPass.

Appointment Management

InfoPass passes the collected information to NASS to store. Along with the customer information, NASS maintains the appointment confirmation notice with appointment details.



Customer Queue Flow

To generate a queuing ticket, the following information from NASS is entered into CMIS: (1) confirmation number; (2) A-Number, USCIS Online Account Number, or Receipt Number; (3) appointment type; (4) appointment time; (5) Zip code; and (6) number in the party. CMIS generates a ticket number for each customer that places the individual in a virtual line. The printed CMIS ticket includes the ticket number, the service request category, and the time the ticket was printed. The information associated with a ticket, such as the A-Number, Receipt Number, and USCIS Online Account Number, is used to index records of past visits to USCIS Field Offices and by the ISO to retrieve the case information for the customer.

Customer Satisfaction Assessments

The customer may choose to complete the feedback card anonymously, or include his or her name and/or phone number if a follow up response is requested. USCIS collects and uses email addresses from online customers to email an e-survey or invitation for participation in a USCIS-sponsored focus group session. Results from the feedback card are stored on the FOD CSDB and other secured shared drives.

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

USCIS collects information directly from the online customer through InfoPass to schedule an appointment or to provide an assessment. Domestically-located individuals may access InfoPass via <https://my.uscis.gov> or a kiosk located at a USCIS Field Office. Internationally-located individuals may only schedule an InfoPass appointment online. Appointment scheduling information is then transferred to and stored in NASS.

CMIS information is collected directly from individuals, during appointment check-in, and recorded by USCIS personnel to document the services provided during a visit.

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. USCIS does not use commercial or publicly available data to schedule appointments and place incoming customers in queue.

2.4 Discuss how accuracy of the data is ensured.

InfoPass collects information directly from the online customer; therefore, USCIS is dependent upon the accuracy of the information provided by the online customer.



InfoPass supports customer access and alteration of information in the system. Online customers are able to update their biographic and appointment information via InfoPass. With the PIN and Confirmation number, online customers can change the appointment time. If an online customer determines information on the appointment confirmation notice is inaccurate, he or she may cancel the appointment. Information associated with a cancelled appointment is immediately deleted upon cancellation. The online customer may then create a new appointment that includes the correct information. InfoPass generates a new PIN and confirmation number whenever the customer schedules a new appointment. NASS maintains all data associated with scheduled and maintained appointments.

USCIS instructs customers to present their printed confirmation appointment notice and a photo identification document at the time of the appointment. USCIS employees manually enter the confirmation number into NASS, which displays the information about the customer and appointment. If the appointment confirmation notice is not available, the Reception Desk Officer manning the front counter manually searches the day's appointments for a name and date of birth match. If there is a match, the customer is issued a CMIS ticket and waits to be called. If there is not a match, the customer will be treated as a walk-in customer.

2.5 Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: There is a risk that USCIS will collect more information than is necessary.

Mitigation: This risk is mitigated. The USCIS Office of Privacy participates in the InfoPass [OMB Control No.: 1615-0113] PRA revision process to ensure that only the minimum amount of information is collected to: (1) schedule an appointment, (2) identify the person making the appointment, (3) maintain a history of his or her visits to a USCIS Field Office, (4) locate his or her file or application, and (5) conduct customer service assessments. The frequency of this process is determined by the Office of Management and Budget (OMB), and usually occurs every three years. All data elements collected are negotiated with and approved by OMB during PRA collection review. Furthermore, USCIS designed its appointment scheduling and support systems to collect and store only the information that is necessary to track and facilitate appointments.

Privacy Risk: There is a risk that USCIS will maintain inaccurate data.

Mitigation: USCIS mitigates the risk of maintaining inaccurate data by collecting information directly from the individual or his or her representative. If an individual with a scheduled appointment identifies inaccurate data on his or her confirmation letter, the individual may correct his or her information by cancelling his or her appointment and creating a new appointment with the accurate information through InfoPass. When an individual cancels his or her appointment, NASS deletes the collected data. If the individual does not notice, or is otherwise unaware that the information is inaccurate, the individual and USCIS have the opportunity to



correct the data when the individual meets with the ISO at his or her USCIS appointment. When an individual makes a USCIS appointment, USCIS requests that the individual bring the USCIS appointment notice confirmation letter and a government-issued identification. This allows the ISO to verify the individual's identity. Once the ISO verifies the individual's identity, the ISO is able to correct inaccurate information.

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 the appointment information collected to schedule and effectively manage appointments made by the customer, queue customers, and conduct a customer satisfaction assessment through the coordination of an e-survey or focus group. Specific uses of the information are as follows:

- Name and date of birth are used to identify the individual when he or she arrives for the appointment;
- Zip code or country is used to locate the field or international office, respectively, closest to the individual scheduling the appointment;
- A-Number, USCIS Online Account Number, and Receipt Number are used to verify the identity of the individual, retrieve associated case data, and update information if there are any discrepancies at the scheduled appointment;
- Email addresses are used to contact the customer for Customer Satisfaction Assessments;
- Email address or phone number is used to contact the applicant in the event of a scheduling issue involving the appointment time;
- Name of additional attendees, number of attendees, and purpose of visit is shared and used by the U.S. Embassy or Consulate security personnel to facilitate visitor processing;¹¹
- Confirmation number and PIN are used by the customer to make changes to or cancel an appointment. If an appointment is cancelled, NASS deletes the appointment and individual information associated with the confirmation number and PIN; and

¹¹ See www.state.gov for additional information on U.S. Embassy or Consulate visits.



- Results from customer satisfaction assessments are used by USCIS to change and modify different aspects about InfoPass and office services in order to improve customer satisfaction.

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. InfoPass, NASS and CMIS do not use technology to conduct electronic searches, queries, or analyses.

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

InfoPass is a public interface and is to be used by online customers to schedule an appointment with a USCIS office. Access to NASS and CMIS is limited to USCIS authorized personnel. There is no intra-departmental sharing of this information.

3.4 Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: There is a risk that InfoPass will collect and use information in a manner inconsistent with USCIS' authority and mission.

Mitigation: Part of USCIS' mission is to provide effective customer-oriented immigration benefit and information services. USCIS created InfoPass to help fulfill this goal. USCIS mitigates the risk of collecting and using information in a manner inconsistent with USCIS' authority and mission by minimizing the amount of information collected and by limiting the purposes for which USCIS may use the information collected when creating an USCIS appointment. To ensure the information is used consistently with the purposes of the original collection, USCIS administrators monitor internal user logs to ensure users are only accessing information related to their job functions. Additionally, all USCIS employees are required to complete role-based training prior to accessing appointment data. As described in the InfoPass Privacy Notice, the primary purpose for collecting the information is to allow USCIS to schedule the appointment. USCIS also uses the information collected to identify the person making the appointment, to maintain a history of his or her visits to a USCIS Field Office, to locate his or her file or application, and to conduct customer service assessments. In addition, USCIS requires that all USCIS NASS and CMIS users receive training on the appropriate use of the information and system prior to being approved for access.

Privacy Risk: There is a risk that negative feedback from customer satisfaction assessments could be inappropriately used to adversely impact the individual's benefit request.



Mitigation: USCIS mitigates this risk by making participation completely voluntary and by ensuring that USCIS only receives results that are not associated with an individual. USCIS contracts with an outside vendor to conduct the customer satisfaction survey and any focus groups. In the email invitation to the survey or focus group, the vendor provides the individual with a notice with the purpose of the survey or focus group, instructions on how to complete the survey or focus group, and how to opt-out of future invitations. USCIS and the vendor conducting the survey or focus group do not request PII from the individual during the customer satisfaction survey or focus group and do not link the responses back to the customer's other records.

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.

USCIS provides general notice to individuals through the publication of this PIA and DHS/USCIS-007 BIS SORN. Additionally, USCIS provides a Privacy Notice prior to the submission of any information. The Privacy Notice notifies the individual about the authority to collect the information requested, purposes, routine uses, and consequences of providing or declining to provide the information to USCIS.¹²

USCIS also contacts the individual by email to request participation in an e-survey or focus group and advises the individual that participation is voluntary. In the email invitation, customers are provided a notice with the purpose of the customer satisfaction assessment, instructions on how to participate, and how to opt-out of future requests.

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

The Privacy Notice informs individuals that providing the information is voluntary. A customer can choose to decline to provide information; however, that may prevent the customer from scheduling an appointment through InfoPass. Once the customer provides the information, he or she does not have the ability to consent for specific uses.

¹² Please see Appendix A to view the USCIS Appointment Scheduler Privacy Notice.



4.3 Privacy Impact Analysis: Related to Notice

There is no risk related to notice. USCIS provides individuals and representatives with several forms of notice. On the InfoPass website, prior to collecting information, USCIS displays a link to the Privacy Notice applicable to InfoPass. The Privacy Notice states that providing information is voluntary, but failure to provide certain requested information may prevent the customer from scheduling an appointment through InfoPass. Additionally, when the individual schedules his or her appointment, InfoPass provides step-by-step instructions that briefly explain why USCIS collects the information and how the agency uses the information. USCIS also provides notice through this PIA and the BIS SORN.

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 negotiating a USCIS Appointment Scheduling Systems Retention Schedule to cover systems used to schedule appointments for biometrics, USCIS offices for interviews, and other appointments. This schedule will cover InfoPass, CMIS, and NASS. The proposed retention period is to delete and destroy no sooner than 10 years from the date of record creation. Once approved, the USCIS Appointment Scheduling Systems Schedule will supersede the NARA-approved the CMIS Retention Schedule [N1-566-08-008]. This schedule covers CMIS and InfoPass records, in which USCIS is set to delete and destroy records when no longer needed for agency business.

5.2 Privacy Impact Analysis: Related to Retention

Privacy Risk: Without an approved retention schedule, there is a risk that information may be retained longer than necessary and may increase the potential of an unauthorized disclosure.

Mitigation: This risk is partially mitigated. USCIS is developing a comprehensive retention schedule to cover USCIS Appointment Scheduling Systems used to schedule appointments for biometrics, USCIS offices for interviews, and other appointments. The proposed NARA schedule is consistent with the concept of retaining data only for as long as necessary to support USCIS mission. Until USCIS completes a NARA-approved retention schedule, USCIS plans to adhere to the CMIS Retention Schedule, which covers InfoPass and CMIS records.



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 International Offices are located within a U.S. Embassy or Consulate. USCIS shares the online customer biographic and appointment with U.S. Embassy or Consulate security personnel to facilitate visitor processing. All visitors are required to make an appointment prior to their arrival, conform to security regulations, and produce a valid photo identification at the entrance. The security personnel use the information provided by USCIS to validate the identity of the visitor.

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

Sharing USCIS data with Department of State (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.

6.3 Does the project place limitations on re-dissemination?

USCIS only shares online customer and appointment data with U.S. Embassies and Consulates for the purpose of verifying the identity of visitors.

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

USCIS maintains an electronic record of all NASS data shared with U.S. Embassies and Consulates.

6.5 Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk of unauthorized sharing of information.



Mitigation: USCIS is careful to securely share data with U.S. Embassies and Consulates that have a need-to-know and use the information for a purpose that is compatible with the original collection. All prospective information handlers must be authorized to access the information. This mitigates the risk of unauthorized disclosure by requiring a trained USCIS employee with access to the information to review the information before sharing the information with security personnel at a U.S. Embassy or Consulate.

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.

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

InfoPass allows online customers to access their scheduled appointments through the online interface. InfoPass allows the individual or his or her representative to cancel an appointment and then schedule another appointment using the correct information if inaccurate information was provided. Customers seeking access to their scheduled appointment information may access it any time prior to the date and time of their scheduled appointment.

CMIS is a customer queuing and information gathering system that manages the flow of customers who visit Field Offices. CMIS gathers limited customer PII and statistical information about the services the customer received while in the office, such as time spent waiting, time spent with an ISO / adjudicator, and types of services offered. USCIS maintains appointment history data in CMIS until the information is no longer needed. Customers seeking access to their appointment history may request access to it at any time.

An individual seeking access to his or her information held by USCIS may 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 or Judicial Redress Act (JRA) still may obtain access to records consistent with FOIA unless disclosure is prohibited by law or if the agency reasonably foresees that disclosure would harm an interest protected by an exemption. Any individual seeking access to his or her information should direct his or her request to the following address:

U.S. Citizenship and Immigration Services
National Records Center
FOIA/PA Office
P.O. Box 648010
Lee's Summit, MO 64064-8010



The process for requesting records can be found at 6 CFR § 5.21. The request should state clearly the information that is being requested. The procedures for making a request for access to one's records can be found on the USCIS web site, located at www.uscis.gov.

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

Online customers and their representatives have the ability to correct information by cancelling the scheduled appointment and then scheduling another appointment using the correct information in InfoPass. The customer must first cancel the appointment, and then reschedule the appointment with the correct information. Customer and appointment data is deleted from NASS when an appointment is cancelled.

Individuals will not have the ability to correct appointment information after the appointment date has passed. Individuals are able to correct potentially inaccurate data that they submitted during the appointment with an ISO.

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

The procedures for individuals to correct their information are outlined in this PIA, the SORNs associated with this system, and the instructions displayed while creating an USCIS appointment. After the appointment is completed, InfoPass does provide an individual means to change appointment data by cancelling the original appointment (before the passing of the appointment date) by using his or her full name, date of birth, confirmation number and PIN number.

7.4 Privacy Impact Analysis: Related to Redress

There is no privacy risk related to redress. The redress and access measures offered by USCIS are commensurate with the purpose of the system. USCIS notifies individuals about procedures to correct their information in this PIA, the SORN associated with this system, and while creating an USCIS appointment. InfoPass allows the individual or his or her representative to cancel an appointment and then schedule another appointment using the correct information if inaccurate information was provided. The cancellation of an appointment will delete all biographic and appointment information including the system-generated data, such as the confirmation number.

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?

InfoPass, NASS, and CMIS have an audit trail capability that monitors user activities and generates alerts for unauthorized access attempts. The general audit log and the security log allows the Global Administrator to select event type such as access or logon and the data displayed includes timestamp, name, IP, transaction, and site. This auditing influences users to use the system appropriately.

NASS limits the number of employees with access to PII to those who need the information to perform their duties, and will utilize software to perform network level auditing of the application. With the exception of district, region, and global administrators, users are limited to access data for only their specific location. NASS retains all data indefinitely for historical and statistical purposes as well as to support the customer service assessments.

The USCIS and DHS trusted internet connection uses a commercial off-the-shelf solution to protect USCIS and internet connections. This network level protection includes connection auditing, detection, and prevention of suspect or malicious connections in order to limit or prevent malicious use of the systems. These products include firewalls, routers, and load balancer/application firewalls that forward system event messages to a central logging facility. The central logging facility has the ability to detect known probe or attack signatures.

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

All federal employees and contractors are required to complete annual privacy and security awareness training. The Culture of Privacy Awareness training addresses appropriate privacy concerns, including Privacy Act obligations (e.g., SORN, Privacy Notice). The Computer Security Awareness training examines appropriate technical, physical, personnel, and administrative controls to safeguard information.

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 employs role-based access controls so only employee users with a need-to-know have access to the information in the system. NASS and CMIS provide a warning banner at all access points to deter unauthorized use of information by external and internal users. The banner warns authorized and unauthorized users about the appropriate uses of the system, that the system may be monitored for improper use and illicit activity, and that there are penalties for non-compliance.



External Users

External users are customers and their representatives who seek to schedule an appointment with a USCIS Field Office. InfoPass is publicly available to customers through my.uscis.gov for the purpose of scheduling and managing an appointment. A customer may only schedule one appointment using his or her PII.

Internal Users

Internal access is limited to registered employee users. Internal access to information is on a need-to-know basis. This need-to-know is determined by the users and their respective responsibilities. Moreover, access privileges, for both internal and external users, is limited by establishing role-based user accounts to minimize access to information that is not needed for appointment management. USCIS has the capability of identifying and deactivating unused accounts.

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 formal review and approval process in place for new sharing agreements. Any new use of information and/or new access requests for the system must go through the USCIS change control process and must be approved by the proper authorities.

Responsible Officials

Donald Hawkins
Privacy Officer
U.S. Citizenship and Immigration Services

Approval Signature

Original, signed copy on file with the DHS Privacy Office

Philip S. Kaplan
Chief Privacy Officer
Department of Homeland Security