



Privacy Impact Assessment

for the

USCIS Outreach and Engagement Program

DHS Reference No. DHS/USCIS/PIA-089

September 8, 2023



**Homeland
Security**



Abstract

The U.S. Department of Homeland Security (DHS) U.S. Citizenship and Immigration Services (USCIS), External Affairs Directorate, Digital Services Division conducts outreach and engagement activities aimed at individuals who have applied for immigration benefits through traditional outreach measures such as emails, text messages, third party outreach service providers (e.g., GovDelivery.com), and postcard mailings. USCIS plans to enhance and expand these activities to include outreach through online filing and accounts and web-based tools. These activities will also involve new outreach and engagement avenues and population-specific outreach to promote immigration and naturalization (e.g., noncitizens who have applied for an immigration status or benefit, Lawful Permanent Residents (LPR), asylees, and refugees). These activities will also include outreach via individual notices/letters, interagency focus groups and studies, advertisement campaigns, outreach to non-profit and public organizations, and potentially television and/or radio broadcasts to increase interest in applying to become a naturalized U.S. citizen. USCIS is conducting a Privacy Impact Assessment (PIA) because these outreach activities may use personally identifiable information (PII) from members of the public. As new outreach and engagement activities are developed, USCIS will update this Privacy Impact Assessment and include appendices to document the new initiatives.

Overview

To promote the opportunities and responsibilities of U.S. citizenship in accordance with 8 U.S.C. § 1443(h) (section 332(h) of the Immigration and Nationality Act),¹ USCIS broadly distributes educational information addressing immigration and naturalization benefits and other requests, hereafter referred to as benefit requests, that individuals may apply for and the requirements to obtain such benefits. Historically, USCIS benefit requests existed primarily in paper form. Applicants, petitioners, and other requestors mailed paper forms and all supporting documents (“evidence”) to designated physical addresses or P.O. boxes. USCIS stored submitted material in a physical file associated with the individual, known as an A-File. Benefit requests were reviewed and adjudicated on paper, and supporting evidence, decision notices, and other materials associated with adjudicating benefit requests were sent by postal mail, receipted, and stored within USCIS record systems. Recent technological advances have permitted USCIS to use alternatives to traditional paper filing. As the breadth and quality of digital solutions increase, the inefficiencies and inconveniences of a paper-based system are reduced.

USCIS has modernized immigration and naturalization benefit administration by providing end-to-end online processing for certain benefit requests. The online process includes the electronic submission, adjudication, and communication of actions taken by USCIS on benefit

¹ 8 U.S.C. § 1443 (h).



requests and other documents submitted online. USCIS is in the process of making all benefit request forms available for online filing.²

Current USCIS Outreach and Engagement Activities to Provide Information about Online Filing, Online Tools, Immigration, Naturalization, Relevant Populations, and Data Sources:

Online Account Creation Outreach

USCIS mails Online Account Notices to eligible individuals who submitted paper applications for benefit requests to inform individuals that they can create an online account to link to their account's paper files, to process their case, to review and respond to a Request for Evidence (RFE), and/or receive a final decision on their case. Individuals can also use their online account to scan and upload paper documents to support their responses to Requests for Evidence. In addition, USCIS will scan paper applications for ingestion into the USCIS Electronic Immigration System (ELIS).³ USCIS retrieves the relevant contact information (including email address) for benefit applicants from the USCIS Electronic Immigration System, which includes scanned paper files. The relevant program office or directorate generates an encrypted spreadsheet containing the contact information and uses it to identify Online Account Notice message recipients. The USCIS Electronic Immigration System searches generate the following information used in the spreadsheet:

- Name;
- Phone number;
- Email address;
- Receipt number;
- Form number; and
- Receipt date.

In rare instances where outreach may involve individuals within Special Protected Classes,⁴ Online

² USCIS continues to implement its plan to expand electronic filing for applications and petitions for immigration benefits consist with Section 4103 of the *Emergency Stopgap USCIS Stabilization Act*, Title I, Div. D of Public Law (P.L.) 116-159 (8 U.S.C. § 1103 note).

³ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE ELECTRONIC IMMIGRATION SYSTEM (USCIS ELIS), DHS/USCIS/PIA-056 (2020 and subsequent updates), *available at*: <https://www.dhs.gov/uscis-pias-and-sorns>.

⁴ Special Protected Classes is a term used to refer to categories of immigration information that are subject to heightened confidentiality provisions, such as asylum information (protected by 8 C.F.R. § 208.6, which is by policy also applied to refugees); information pertaining to those who have applied for or received certain victim-related benefits (such as Violence Against Women Act (VAWA) self-petitioners and their derivatives; certain victims of trafficking who apply for T visas and their derivatives; or victims of certain qualifying crimes who apply for U visas



Account Notice mailings will be sent to the designated safe address. Additionally, no identifying information about their status will be included in the spreadsheet used to generate the contact list.

Online Filing Form I-90, Application to Replace Permanent Resident Card Outreach

Through the outreach program, USCIS informs Lawful Permanent Residents about the online filing option for Form I-90, *Application to Replace Permanent Resident Card* (“Green Card”).⁵ USCIS obtains contact information of eligible individuals from the USCIS Enterprise Citizenship and Immigration Services Centralized Operational Repository (eCISCOR)⁶ Benefits Mart module and the Alien Change of Address Card (AR-11) System⁷ based on Green Card expiration date searches. USCIS then sends information via email, text message, and messaging via third-party service providers (e.g., GovDelivery.com), in the form of notices, letters, and/or in postcard format to Lawful Permanent Residents with expiring Green Cards that have not applied for a renewed card. This messaging (an advertisement for USCIS online services) consists of general language that contains no personally identifiable information or indication that the recipient of the message has an approved USCIS case.⁸ USCIS will use the same messaging approach for the additional initiatives below unless otherwise specified.

The relevant program office will generate an encrypted spreadsheet to maintain the contact information and identify message recipients. USCIS will obtain the following information from USCIS Enterprise Citizenship and Immigration Services Centralized Operational Repository Benefits Mart module and Alien Change of Address Card system searches and add the following information to the encrypted spreadsheet:

- Name;
- A-Number;
- Class of admission⁹ (Reason for granting Lawful Permanent Resident status in the

and their derivatives; these individuals are protected by 8 U.S.C. § 1367); information related to Temporary Protected Status (TPS, protected by 8 C.F.R. § 244.16), and information related to Legalization/ LIFE Act/ Special Agricultural Workers (SAW) (protected by INA § 245A(c)(4), (5); INA § 210(b)(5), (6); 8 C.F.R. §§ 210.2(e)(3), 245a.2(t); and 245a.21).

⁵ USCIS Form I-90, *Application to Replace Permanent Resident Card (Green Card)*, available at: <https://www.uscis.gov/i-90>.

⁶ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE ENTERPRISE CITIZENSHIP AND IMMIGRATION SERVICES CENTRALIZED OPERATIONAL REPOSITORY (ECISCOR), DHS/USCIS/PIA-023 (2018 and subsequent updates), available at: <https://www.dhs.gov/uscis-pias-and-sorns>.

⁷ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE ALIEN CHANGE OF ADDRESS CARD SYSTEM (AR-11), DHS/USCIS/PIA-018, available at: <https://www.dhs.gov/uscis-pias-and-sorns>.

⁸ The use of personally identifiable information would be internal to USCIS to compile the mailing list of individuals who should receive the message. From the contact list, only the address is used for the mailer.

⁹ Immigrant Classes of Admission: A Lawful Permanent Resident or “green card” recipient may live and work



United States);

- Green Card expiration date;
- Address (from last form filed; if Form AR-11, Alien's Change of Address Card, filed, that address will also be listed);
- Phone number;
- Email address; and
- Receipt number, form number, and receipt date for the last form filed with USCIS

The spreadsheet distribution will be limited to USCIS employees who have a need to conduct this outreach and engagement activities in the performance of their official duties. To ensure that USCIS obtains the latest and most accurate mailing address, an individual or the individual's representative (e.g., attorney) is required to submit a change of address request online, via myUSCIS,¹⁰ or, in limited circumstances, by paper application.¹¹ USCIS will continue to perform checks on these records to ensure that no information (including safe addresses) on any individual in a Special Protected Class is obtained and/or shared with anyone who lacks the need to know.

Online Filing Form I-751, Petition to Remove Conditions on Residence Outreach

The USCIS Office of Intake and Document Production (OIDP) indicated that one of the leading causes for Form I-751¹² rejection at a USCIS Lockbox¹³ is that many petitioners submit the form too early. Generally, the form must be jointly filed within the 90-day window immediately preceding the expiration of a conditional permanent resident's status. Per 8 CFR § 216.2(b),¹⁴ USCIS sends reminder notices to Conditional Permanent Residents (CPR) at their last known address approximately 90 days before the second anniversary of the date on which the noncitizen obtained conditional permanent residence, informing them of the need to file the I-751. In practice, USCIS generally sends emails and text messages to Conditional Permanent Residents informing

anywhere in the United States and may apply to become a U.S. citizen if they meet certain eligibility and admissibility requirements. The INA provides several broad classes of admission for foreign nationals to gain Lawful Permanent Resident status, the largest of which focuses on admitting immigrants for the purpose of family reunification. Other major categories include economic and humanitarian immigrants, as well as immigrants from countries with relatively low levels of immigration to the United States.

¹⁰ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE myUSCIS PLATFORM, DHS/USCIS/PIA-064, available at: <https://www.dhs.gov/uscis-pias-and-sorns>.

¹¹ Detailed information about how to change addresses can be found at <https://www.uscis.gov/addresschange>.

¹² USCIS Form I-751, Petition to Remove Conditions on Residence, available at: <https://www.uscis.gov/i-751>.

¹³ A "Lockbox" is a secure facility used by USCIS to accelerate financial deposits and receipts collection.

¹⁴ 8 CFR § 216.2(b), available at: <https://www.govinfo.gov/content/pkg/CFR-2010-title8-vol1/pdf/CFR-2010-title8-vol1-sec216-2.pdf>.



them of the need to file Form I-751 precisely within that 90-day window.¹⁵ USCIS will send general advertisement emails, notices, letters, and text messages to individuals using their email address, physical address, and mobile phone number obtained from previous application filings (if available) to promote USCIS' online tools, specifically the Filing Calculator for Form I-751. The USCIS Enterprise Citizenship and Immigration Services Centralized Operational Repository provides all relevant contact information for these individuals, which will be included in an encrypted spreadsheet used to compile the contact information and to identify message recipients. The USCIS Enterprise Citizenship and Immigration Services Centralized Operational Repository provides the following information:

- Name;
- Class of admission (Reason for granting Lawful Permanent Resident status in the United States);
- Date of admission;¹⁶
- A-Number;
- Address (from last form filed; if Form AR-11 filed, that address will also be listed);
- Green Card expiration date;
- Phone number;
- Email address; and
- Receipt number, form number, and receipt date.

Naturalization Test and Test Study Packet Information Outreach

USCIS is responsible for administering naturalization tests to noncitizens as a condition of their naturalization. The tests consist of two components:

1. Understanding the English language, which is determined by the applicant's ability to read, write, and speak English; and
2. Knowledge of U.S. history and government, which is determined by a civics test.

The USCIS Office of Citizenship is responsible for promoting public awareness of citizenship and immigration services and educational materials. When resources are available, USCIS will send targeted, unsolicited email messages (and text messages to available mobile phone numbers) to

¹⁵ USCIS will continue to determine the best method for contacting individuals who are in a protected status to mitigate potential inadvertent exposure of their identities and/or location to individuals that do not have a need to know the information.

¹⁶ Date of admission is the date on which an individual(s) was granted lawful permanent resident or conditional permanent resident status into the United States.



naturalization applicants to provide information regarding the test or any updates to the test or its contents. The email message, and in some cases, mailed notices and letters, will direct individuals to the correct online study materials. The email is a one-way message from USCIS to individuals who have a pending Form N-400, *Application for Naturalization*.¹⁷ The USCIS Electronic Immigration System provides all relevant contact information for these individuals and will be included in an encrypted spreadsheet as described above. The USCIS Enterprise Citizenship and Immigration Services Centralized Operational Repository provides the following information:

- Name;
- Date of filing;
- Receipt number;
- Address;
- Email address; and
- Cell or mobile number.

Communication Methods

Email:

USCIS will email individuals to notify them of the opportunity to file online, create an online account, or use the agency's online tools, or to provide updates on immigration, naturalization, and citizenship. The email provides a link to the relevant webpage and provides additional information on the benefits associated with USCIS' online services and resources such as:

- Using a phone, tablet, or computer to file online;
- Receiving instant confirmation that the application was received;
- Ability to instantly upload additional evidence;
- Receiving case status updates;
- Sending secure messages to USCIS about their case;
- Paying fees directly to USCIS;
- Ability to easily determine submission schedules for certain forms;
- Information about expiration of immigration benefits (if applicable); and
- Information about other immigration benefits including naturalization/citizenship.

¹⁷ USCIS Form N-400, Application for Naturalization, available at: <https://www.uscis.gov/n-400>.



Text Messages:

USCIS sends text messages to individuals using their mobile phone number obtained from previous filings (if available) to remind them that USCIS offers online filing for several form types, online accounts, general information regarding immigration benefits including naturalization and citizenship, and online tools, with a link to the relevant webpage.

Postcards:

USCIS sends postcards to the last known mailing address (or safe mailing address¹⁸ of individuals protected under 8 U.S.C § 1367) of individuals to notify them that they can file the relevant benefit form online. In addition, postcards may be used in the future to provide information about expiring immigration benefits (if applicable) and information about other immigration benefits, including naturalization and citizenship. The postcard displays a promotional hyperlink or QR code that redirects the user to the USCIS online form filing webpage which identifies how many individuals responded to the postcard but does not collect or track identifying information. The website also provides information about the topic in the postcard. The postcards are addressed to “current resident” to mitigate personally identifiable information exposure.

Communication Timeline

USCIS sends messages to individuals with Green Cards set to expire within six (6) months regarding eligibility to renew their card. This approach supports USCIS’ efforts to ensure that only individuals who are eligible to renew their Green Cards are notified. USCIS also sends two reminder messages notifying individuals about their Green Card’s expiration date. The first reminder is sent four months in advance and the second reminder is sent two months within the expiration date. USCIS also sends messages monthly to individuals who submitted a paper application within the prior month notifying them that they are eligible for online filing. USCIS sends messages monthly to Conditional Permanent Residents (and their spouses, if applicable) with Green Cards set to expire within 120-150 days.¹⁹ USCIS provides information in each communication to assure individuals that the messages are not scam communications. For example, USCIS instructs individuals to only open web links that end in “.gov” and provides a link to direct users to the USCIS.gov website.

¹⁸ USCIS takes steps to protect the information of victims of domestic violence. If an individual resides in a shelter or safe house at the time of filing for naturalization, or they otherwise do not feel safe providing their current physical address, they may provide a “safe address” (mailing address) where they are able to receive mail. This might be a P.O. box or the address of a friend, an attorney, a community-based organization that is assisting them, or any other address where they can safely and timely receive mail.

¹⁹ USCIS will continue to determine the best method for contacting individuals that are in a protected status to mitigate potential inadvertent exposure of their identities and/or location to individuals who do not have a need to know the information.



Additional messaging containing information about other immigration benefits, to include naturalization and citizenship, occurs annually for applicants that have a current immigration status and may be eligible for other benefits.

Expanded USCIS Outreach and Engagement Activities to Provide Information about Online Filing, Online Tools, Immigration, Naturalization, Relevant Populations, and Data Sources

USCIS continues to enhance its online presence in support of its immigration and naturalization promotion efforts while acknowledging that certain populations maintain a preference or need for traditional outreach and engagement communication methods. USCIS also seeks to promote awareness of the rights, responsibilities, and importance of U.S. citizenship, and the free citizenship preparation resources available to individuals pursuing immigration benefits or naturalization. The primary goals are to:

1. Invite immigrants and immigrant-serving organizations to learn more about U.S. citizenship; and
2. Ensure that immigrants, immigrant-serving organizations, individuals on a path toward citizenship, and other groups have access to official, trusted sources of information through USCIS and community-based channels.

Therefore, USCIS will use information it currently maintains on individuals, including names, A-Numbers, addresses, and contact information maintained in secure USCIS systems and databases (e.g., USCIS Electronic Immigration System, Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems,²⁰ and Central Index System 2 (CIS2)²¹) to permit employees with a need to know to accomplish the agency's statutory obligation to broadly distribute educational information concerning immigration and naturalization benefits that individuals may apply for and the requirements to obtain such benefits. Only employees with an assigned role and a need to know to accomplish this mission will be permitted to access these records. The records compiled and used will be maintained in encrypted spreadsheets and stored in secured shared repositories within the USCIS Digital Services Division and/or the Office of Performance and Quality in accordance with approved National Archives and Records Administration (NARA) General Records Schedules (GRS) as stated in Section 5 below. USCIS will use all available communication resources to reach target groups to promote citizenship and naturalization. These additional outreach and engagement activities include:

²⁰ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE COMPUTER LINKED APPLICATION INFORMATION MANAGEMENT SYSTEM (CLAIMS 3) AND ASSOCIATED SYSTEMS, DHS/USCIS/PIA-016, available at: <https://www.dhs.gov/uscis-pias-and-sorns>.

²¹ SEE U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE CENTRAL INDEX SYSTEM 2, DHS/USCIS/PIA-009, available at: <https://www.dhs.gov/uscis-pias-and-sorns>.



1. USCIS/General Services Administration (GSA), Office of Evaluation Sciences (OES) Collaboration:

USCIS is committed to improving evidence-based policy, regulatory, programmatic, and operational decision making. USCIS has renewed goals to promote naturalization in the United States. There are currently more than nine million immigrants who may be eligible for citizenship who have not applied. According to survey results, most immigrants express interest in becoming a U.S. citizen when asked in periodic community relations, stakeholder outreach, and customer/user experience and/or satisfaction surveys. To address this disparity, USCIS seeks to identify and address barriers to naturalization through rigorous evaluation. By identifying eligible populations and the barriers that potentially deter such individuals from applying for naturalization, and rigorously testing programmatic approaches, USCIS can reduce those barriers and potentially increase naturalization. By identifying and reducing barriers to naturalization, USCIS can make meaningful improvements to the naturalization process and create more equitable access to the rights afforded to naturalized U.S. citizens by partnering with General Services Administration (GSA), Office of Evaluation Sciences (OES) and affiliated academic professionals who are brought on as GSA employees to design and implement rigorous evaluation, in pursuit of USCIS naturalization goals. USCIS will seek services from the GSA Office of Evaluation Sciences to conduct a study to determine the effectiveness of USCIS naturalization promotion efforts. USCIS will also employ GSA to conduct targeted direct outreach on behalf of USCIS to assist its efforts to provide voter registration awareness and outreach support to newly naturalized citizens. USCIS will also seek services from and collaborate with the GSA Office of Evaluation Sciences to design, implement, and publish findings and analyses of rigorous evaluation of USCIS communication and outreach efforts, and other immigration and naturalization programs or process activities and interventions. Collaboration between USCIS and GSA Office of Evaluation Sciences will help increase equitable access to benefits and services, improve effectiveness of services, enhance the immigration process, and increase agency efficiencies.

USCIS and GSA Office of Evaluation Sciences entered into an Information Data Sharing Agreement to formalize deliverables and expectations.²² USCIS also plans to engage with GSA to document its work supporting direct voter registration outreach. There are instances where certain outreach and engagement initiatives may or may not require all the data elements listed below.

²² No individual level data (i.e., personally identifiable information) will be detailed in any public reports or academic publications. Only summary statistics and summary figures will be included in study reports and publications. GSA Office of Evaluation Sciences will provide drafts of each planned publication (including those created by affiliated academic professionals brought on through Intergovernmental Personnel Acts as GSA employees) for USCIS review and approval prior to publishing or presenting results or conclusions of the analyses. This review will allow USCIS to ensure that only summary anonymized statistics will be included in study reports and publications.



Generally, USCIS will share the following de-identified²³ data with the GSA Office of Evaluation Sciences to facilitate the study and outreach activities. The data elements include:²⁴

- ID Number (Unique ID number to replace the USCIS A-Number for this study);
- Date of birth (month and year);
- Binned (grouped) age when the individual obtained Lawful Permanent Resident status;
- Binned (grouped) Class of Admission (COA) code;
- Country of birth (COB) code;
- Binned (grouped) country of birth code;
- Fiscal year when granted Lawful Permanent Residents status;
- Date granted Lawful Permanent Residents status;
- Gender/sex when granted Lawful Permanent Residents status;
- Marital status when granted Lawful Permanent Residents status;
- Country of nationality;
- State of latest address as Lawful Permanent Residents;
- ZIP code of latest address as Lawful Permanent Residents;
- Core-Based Statistical Area based on ZIP code of latest address as Lawful Permanent Residents;
- Addresses;
- USCIS estimate of propensity to file a first N-400 in the next year;
- Date first N-400 was filed/received;
- Determination of whether the first N-400 was filed online or by paper;
- Determination of whether the first N-400 paid the full fee, partial fee, or fee waived;

²³ De-identified data is data that is stripped of any content or links that could be used to identify a person. In this context, de-identified data refers to identifiers, such as A-Number, name, and full date of birth.

²⁴ Due to confidentiality provisions that generally prohibit disclosure except under specified circumstances, USCIS will not disclose data for the naturalization outreach initiative that are subject to the following statutes/regulations: 8 U.S.C. § 1367 relating to individuals who applied for and/or received T nonimmigrant status; U nonimmigrant status; or benefits under the Violence Against Women Act; or the derivatives of any such persons. In addition, a Secretarial waiver to authorize the disclosure of 8 C.F.R. § 208.6 de-identified data (Disclosure of Asylum Information to Third Parties, which is applied to refugee information by policy) was approved by the DHS Secretary.



- Marital status at naturalization (only Lawful Permanent Residents who filed N-400 and swore or affirmed oaths);
- State of residence at naturalization (only Lawful Permanent Residents who filed N-400 and swore or affirmed oaths);
- ZIP code of residence at naturalization (only Lawful Permanent Residents who filed N-400 and swore or affirmed oaths);
- English test exemption (Yes/No);
- Reading test exemption (Yes/No);
- Writing test exemption (Yes/No);
- Civics test exemption (Yes/No);
- Oral test exemption (Yes/No);
- Request for Evidence sent while processing the N-400 (Yes/No);
- N-648²⁵ submitted with N-400 (Yes/No);
- Second interview required (Yes/No);
- Outcome of first N-400 application (Approved, Denied, Withdrawn); and
- Date of first N-400 decision.

To facilitate the GSA Office of Evaluation Sciences study, USCIS contracted with LexisNexis to enable USCIS to ensure they have the most up to date address information for the Lawful Permanent Residents who may be contacted as part of naturalization outreach initiatives, except for individuals in Special Protected Classes for which only the safe address will be used. Having accurate address data to use to contact Lawful Permanent Residents is critical to the success of such initiatives; USCIS's address data is often approximately six to nine years old for the targeted population. The batch address project should result in a much greater rate of success in reaching each Lawful Permanent Resident included in the study, since LexisNexis has updated address information from publicly available sources. LexisNexis maintains the Accurant system which has access to over 84 billion public records from over 10,000 diverse sources, comprising public, private, regulated, emerging, and derived data. To enable this search of the Accurant system, USCIS established a contract with LexisNexis under which USCIS will provide selected information on Lawful Permanent Residents to LexisNexis and they will complete the Accurant search to identify the updated address information. Use of current address information provided

²⁵ Form N-648, *Medical Certification for Disability Exceptions*, is used by naturalization applicants to request an exception from the English and civics testing requirements for naturalization because of a physical or developmental disability or mental impairment, available at: <https://www.uscis.gov/n-648>.



by LexisNexis will ensure that GSA Office of Evaluation Sciences has access to the most accurate data possible to complete the study. USCIS will ensure that any contract entered with the data broker(s) includes a clause stating that they may not retain the information entered into the search function beyond what is needed to produce results. USCIS will submit a Privacy Impact Assessment update for future outreach efforts or if the existing activities require additional personal identifiers for processing purposes.

USCIS may leverage additional external organizations to perform outreach and engagement activities in the future. If this happens, this Privacy Impact Assessment will be updated to indicate which external organizations are performing USCIS outreach activities. USCIS will provide the encrypted data of Lawful Permanent Residents to LexisNexis²⁶ which will include the following data elements:

- Unique identifier (Randomly generated 10-digit Hash Number to replace the A-Number);
- Name;
- Truncated Social Security number (Last 4 digits, provided to LexisNexis exclusively, to obtain and validate the latest/most accurate mailing address);²⁷
- Date of birth;
- Phone number; and
- Past address(es).

The data provided to LexisNexis by USCIS will not become part of LexisNexis' retrievable dataset. LexisNexis will retain the dataset for a maximum of two years and six months after their return dataset has been delivered to USCIS, as required by LexisNexis to respond to any internal LexisNexis audits. During that time, LexisNexis will store the dataset in encrypted form and in a secured environment and the information will only be accessible to individuals authorized to access this information for auditing purposes and will use it for no other purpose. After the auditing need for the data has expired, but no later than two years and six months after the return dataset has been delivered to USCIS, LexisNexis will inform USCIS in writing that the dataset has been destroyed.

2. Noncitizens with USCIS Online Accounts and Approved Adjustment of Status Applications:

²⁶ USCIS cannot use the LexisNexis search tool within the USCIS environment as it is owned and operated by LexisNexis.

²⁷ USCIS assessed the minimal data elements needed to accurately identify individuals and determined that date of birth and the last 4 digits of the Social Security number (if available) are needed to properly identify individuals.



The myUSCIS Account Experience²⁸ (“myUSCIS”) publicly accessible web portal is a personalized online environment that helps individuals navigate the immigration process. Through myUSCIS, individuals, including noncitizens, are able to establish an online account to electronically manage their account and profile; file applications, petitions, and requests for immigration benefits; access submitted and USCIS-generated documents; and view case status information. Noncitizens also may submit Adjustment of Status applications to USCIS via their myUSCIS online account. USCIS will transmit Lawful Permanent Resident approval notifications to the noncitizen’s (and/or their designated representative’s) online account mailbox. USCIS may also contact these individuals via postcard for outreach and engagement events about other immigration benefits including naturalization/citizenship. USCIS will identify this population by obtaining the following information from the USCIS Enterprise Citizenship and Immigration Services Centralized Operational Repository:

- Name;
- A-Number;
- Date of birth;
- Date Lawful Permanent Resident status is granted;
- Green Card expiration date;
- Address (from last form filed; if Form AR-11 filed, that address will also be listed); and
- Immigration status.

3. Lawful Permanent Residents with USCIS Online Accounts:

USCIS will notify Lawful Permanent Residents via their existing USCIS online account that they are within one year of their Permanent Resident Card (“Green Card”) expiring and three to five years after the date they obtained Lawful Permanent Resident status (when they may become eligible for naturalization). USCIS will identify this population by obtaining the following information from the USCIS Enterprise Citizenship and Immigration Services Centralized Operational Repository:

- Name;
- A-Number;
- Date of birth;

²⁸ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE MYUSCIS ACCOUNT EXPERIENCE, DHS/USCIS/PIA-071 (2021 and subsequent updates), available at: <https://www.dhs.gov/uscis-pias-and-sorns>.



- Date Lawful Permanent Resident status is granted;
 - Lawful Permanent Resident class of admission code (used to denote whether individual is married to a U.S. citizen);
 - Green Card expiration date; and
 - Address (from last form filed (I-485/I-90/I-751); if Form AR-11 filed, that address will also be listed).
4. Lawful Permanent Residents Without a USCIS Online Account That Are Within One Year of Their Permanent Resident Card (“Green Card”) Expiring or Have an Expired Card:

USCIS will contact members of specific groups of Lawful Permanent Residents who have been identified as having a high number of potentially eligible to naturalize members through publicly advertised events/advocacy groups or Non-Government Organizations (NGO), which may be based on their status, country of birth or nationality, age, or other demographics to advise them of forthcoming expiring immigration documentation (e.g., Green Cards), how to file relevant benefit forms online, and to provide awareness into other immigration benefits including naturalization/citizenship. To contact these individuals, USCIS will pursue traditional multimedia avenues, such as national and local television and radio advertisements, to provide information and promote immigration benefits including naturalization/citizenship to these populations. USCIS will also conduct physical outreach by participating in community events that include but are not limited to immigration fairs, congressional events involving immigration, immigration teacher/educational events, and external stakeholder-hosted events. USCIS will use these events to provide brochures and pamphlets and other promotional information. USCIS will also leverage community organizations to serve as points of contact to assist with providing information to these populations. These general outreach and engagement activities will be focused generally on large groups rather than individuals and therefore would not involve collecting and/or using personally identifiable information.

5. Specific Outreach and Engagement within Various Groups:

USCIS will contact members of the various groups which may be based on their status, country of birth or nationality, age or other demographics to advise them of forthcoming expiring immigration documentation (e.g., Green Cards), how to file relevant benefit forms online, and to provide awareness into other immigration benefits including naturalization/citizenship. To contact these individuals, USCIS may use the communication methods noted above (emails, text messages, third party outreach service providers (e.g., GovDelivery.com), postcard mailings, and direct individual notices/letters). To identify contact information such as the phone number, email address, or mailing address, USCIS will use information previously provided by the individual as a part of the benefit request. USCIS may also use information collected by and provided to USCIS



by other Department of Homeland Security Components, such as Customs and Border Protection, as part of its outreach and engagement activities directed at individuals that have applied for or may be eligible for certain immigration benefits. Information received from other Components will be used strictly for the specific outreach and engagement program and will be deleted after one year. At this time, any contact information received from U.S. Customs and Border Protection (CBP) will be used strictly for USCIS's Employment Authorization Document outreach and no information will be provided to CBP by USCIS. While personally identifiable information will be used to identify who will receive the outreach, the messages sent to the individuals will be generic messages and will not contain personally identifiable information. Information to identify individuals may include:

- Name;
- Current benefit type;
- Phone number;
- Address (from last form filed; if Form AR-11 filed, that address will also be listed); and
- Email address.

To broadly contact these individuals, USCIS will also pursue traditional multimedia avenues, such as national and local television and radio advertisement to conduct outreach, provide general information, and promote immigration benefits including naturalization/citizenship to these populations. USCIS will also provide physical outreach by participating at community events. USCIS will use these events to provide brochures and pamphlets and other promotional information to interested individuals. USCIS will also leverage Community Organizations to serve as points of contact to assist with providing information to these populations. These community events/activities will not involve collecting and/or using personally identifiable information.

6. Outreach and Engagement to Vietnamese Lawful Permanent Residents Over the Age of 65:

For example, USCIS will contact by postcard Vietnamese Lawful Permanent Residents over the age of 65 who do not have USCIS online accounts and have expired Green Cards or are within one year of the Green Card's expiration. This target population resides primarily in the Los Angeles, CA, and the Dallas, TX, metropolitan areas. USCIS intends to mail the postcards to the current address on file with USCIS as well as provide the promotional information to community-based organizations supporting the target population. USCIS may also pursue television and radio advertisements in the language(s) used by this population. USCIS will identify this population by obtaining the following information from the USCIS Enterprise Citizenship and Immigration Services Centralized Operational Repository:



- Name;
- A-Number;
- Date of birth;
- Date Lawful Permanent Resident status was granted;
- Green Card expiration date; and
- Address (from last form filed; if Form AR-11 filed, that address will also be listed).

7. Special Immigrant Juveniles:

USCIS may host public engagements for noncitizens who may be eligible for Special Immigrant Juvenile (SIJ) classification and eventual adjustment of status. The Special Immigrant Juvenile classification is intended to provide humanitarian protection for children who cannot reunify with one or both parents because of abuse, neglect, abandonment, or a similar basis under state law. If a juvenile court has made certain judicial determinations and issued orders under state law on dependency or custody, parental reunification, and the best interests of the child, then the child may be eligible for Special Immigrant Juvenile classification. USCIS determines if the child meets the requirements for Special Immigrant Juvenile classification by adjudicating a Petition for Amerasian, Widow(er), or Special Immigrant (Form I-360).²⁹ USCIS' adjudication of the Special Immigrant Juvenile petition includes review of the petition, the juvenile court order(s), and supporting evidence. Children who receive Special Immigrant Juvenile classification are able to apply to adjust status to become a lawful permanent resident if a visa number is available. USCIS may contact these individuals by their last known mailing address or email after the adjustment of status has been approved to provide brochures regarding naturalization or other matters of interest to this population. USCIS may also work with national and local community organizations to provide informational sessions and brochures about immigration benefits including naturalization and/or citizenship. USCIS may notify individuals who maintain active USCIS online and/or GovDelivery accounts of matters pertaining to naturalization/citizenship. USCIS may also contact these individuals via postcard, letters, and outreach and engagement events. USCIS will identify this population by obtaining the following information from the USCIS Enterprise Citizenship and Immigration Services Centralized Operational Repository:

- Name;
- A-Number;
- Date of birth;
- Date Special Immigrant Juvenile classification or Lawful Permanent Resident status

²⁹ USCIS Form I-360, Petition for Amerasian, Widow(er), or Special Immigrant, *available at*: <https://www.uscis.gov/i-360>.



is granted;

- Green Card expiration date;
- Address (from last form filed; if Form AR-11 filed, that address will also be listed); and
- Email address.

8. Lawful Permanent Residents With Permanent Resident Cards Set to Expire within the Next Six Months (and have not filed a Form I-90 or N-400):

USCIS may contact this population by postal mail/postcard to promote online filing. The generic postcards will not contain the names or identifying information regarding an individual. They are solely addressed to “Resident.” USCIS will determine the best method for contacting individuals that are in a protected status to mitigate potential inadvertent exposure of their identities and/or location to individuals that do not have a need to know the information with safe address information from a USCIS system. USCIS may also directly send notices by mail or email and also engage with individuals that maintain active USCIS online and/or GovDelivery accounts. USCIS may also contact these individuals via outreach and engagement events. USCIS will identify this population by obtaining the following information from the USCIS Enterprise Citizenship and Immigration Services Centralized Operational Repository:

- Name;
- A-Number;
- Date of birth;
- Date Lawful Permanent Residents_status is granted;
- Green Card expiration date; and
- Address (from last form filed; if Form AR-11 filed, that address will also be listed).

9. Lawful Permanent Residents who have filed Form I-90:

USCIS will contact this population by postal mail, postcard, or the email provided on the Form I-90, which is used to request a replacement Lawful Permanent Resident Card. When a new Form I-551 (“Green Card”)³⁰ is sent to an individual, USCIS will also include a naturalization pamphlet. USCIS may also engage with individuals that maintain active USCIS online and/or GovDelivery accounts to notify them of matters pertaining to naturalization/citizenship. USCIS may also contact these individuals via outreach and engagement events. USCIS will identify this

³⁰ USCIS Lawful Permanent Resident Card (Form I-551), available at: <https://www.uscis.gov/i-9-central/form-i-9-resources/handbook-for-employers-m-274/120-acceptable-documents-for-verifying-employment-authorization-and-identity/121-list-a-documents-that-establish-identity-and-employment-authorization>.



population by obtaining the following information from the USCIS Enterprise Citizenship and Immigration Services Centralized Operational Repository:

- Name;
- A-Number;
- Date of birth;
- Date Lawful Permanent Residents status is granted;
- Green Card expiration date; and
- Address (from last form filed; if Form AR-11 filed, that address will also be listed).

10. Violence Against Women Act (VAWA) Self-Petitioners and U and T Nonimmigrant Visa Status Holders with Approved Adjustment of Status who do not have USCIS Online Accounts:

USCIS may contact individuals who are protected by 8 U.S.C. § 1367 (Violence Against Women Act,³¹ U,³² and T³³ nonimmigrant designations) by sending naturalization information brochures with any adjustment of status approval notice to their last known safe or preferred mailing address.

Applicants and recipients of Violence Against Women Act, T, and U benefits may mail change of address requests to USCIS via Form AR-11 or a signed written notice or by other authorized processes.³⁴ USCIS will update the individual's address as rapidly as possible to ensure that we are using the most recent address submitted by the individual. USCIS will continue to assess the best method for contacting individuals who are protected by 8 U.S.C. § 1367 to mitigate potential inadvertent exposure of their identities and/or location to individuals who do not have a need to know the information. USCIS may also engage with individuals who maintain

³¹ See INA 1011(a)(51), which lists the benefits covered under the term "VAWA self-petitioner." This list includes persons qualifying for relief as: a Violence Against Women Act self-petitioner under INA 204(a); an abused spouse filing a waiver based on battery or extreme cruelty for a Petition to Remove Conditions on Residence under INA 216(c)(4)(C),(D); an abused spouse or child under the Cuban Adjustment Act; an abused spouse or child under the Haitian Refugee Immigrant Fairness Act; and an abused spouse or child under the Nicaraguan Adjustment and Central American Relief Act. Applicants for Special Rule Cancellation of Removal under INA 240A(b)(2) are also protected under 8 U.S.C. § 1367.

³² U nonimmigrant status (U visa) is a temporary immigration benefit that enables victims of certain crimes who have suffered mental or physical abuse to remain in the United States for an initial period of up to 4 years if they were helpful, are being helpful, or are likely to be helpful to law enforcement or government officials in the investigation or prosecution of criminal activity.

³³ T nonimmigrant status (T visa) is a temporary immigration benefit that enables certain victims of a severe form of trafficking in persons to remain in the United States for an initial period of up to 4 years if they have complied with any reasonable request for assistance from law enforcement in the detection, investigation, or prosecution of human trafficking or qualify for an exemption or exception.

³⁴ See, Victims of Domestic Violence, Trafficking and Other Crimes, "How to Change Your Address" uscis.gov.



GovDelivery accounts to notify them of matters pertaining to applications for adjustment of status and naturalization. USCIS will also conduct outreach through information sessions with nonprofit organizations with access to this population. USCIS will identify this population by obtaining the following information from the Person Centric Query Service (PCQS),³⁵ Central Index System 2 (CIS2),³⁶ the USCIS Electronic Immigration System, or Person Centric Identity Service (PCIS) system:

- 8 U.S.C. § 1367 Flag;³⁷
- Name;
- A-Number;
- Date of birth;
- Date status is granted;
- Green card expiration date; and
- Address (from last form filed, if Form AR-11 filed, that address will also be listed).

11. Asylees and Refugees:

USCIS may contact asylees and refugees, prior to and post-adjustment to Lawful Permanent Resident status, by sending information regarding naturalization/citizenship and informational brochures to their last known mailing address or email. USCIS may also engage with individuals that maintain active USCIS online and/or GovDelivery accounts to notify them of matters pertaining to adjustment of status applications and naturalization/citizenship. USCIS may also contact these individuals via postcard, outreach, and engagement events. Any communications to these individuals will not contain information regarding their classes of admission as refugee or asylee thereby ensuring that privacy regarding their protected status is maintained. USCIS will identify this population by obtaining the following information from the USCIS Enterprise Citizenship and Immigration Services Centralized Operational Repository:

³⁵ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE PERSON CENTRIC QUERY SERVICE, DHS/USCIS/PIA-010 (2018 and subsequent updates), *available at*: <https://www.dhs.gov/uscis-pias-and-sorns>.

³⁶ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE CENTRAL INDEX SYSTEM 2, DHS/USCIS/PIA-009 (2018 and subsequent updates), *available at*: <https://www.dhs.gov/uscis-pias-and-sorns>.

³⁷ 8 U.S.C. § 1367 Flags identify cases where benefit requestors must be protected against the unauthorized disclosure or use of any information related to them pursuant to 8 U.S.C. § 1367. Individuals entitled to such protections are those who have applied for or received certain victim-based immigration benefits (applicants and derivatives of T visas, U visas, and relief under the Violence Against Women Act (VAWA)). Currently, this flag is in CIS2.



- Name;
- A-Number;
- Date of birth;
- Date status is granted;
- Green Card expiration date; and
- Address (from last form filed; if AR-11 filed, that address will also be listed).

12. Noncitizens Approved for Adjustment of Status without USCIS Online Accounts:

USCIS will contact individuals who have approved adjustment of status applications and who do not currently have an online account by sending a naturalization brochure with the approval notice to their last known mailing address (as reflected on their application or updated through the AR-11 process). These individuals will also receive a “Welcome to the United States – A Guide for New Immigrants” pamphlet. USCIS may also contact these individuals via postcard, letters, and outreach and engagement events. USCIS will identify this population by obtaining the following information from the USCIS Enterprise Citizenship and Immigration Services Centralized Operational Repository:

- Name;
- A-Number;
- Date of birth;
- Green Card expiration date; and
- Address (from last form filed; if Form AR-11 filed, that address will also be listed).

13. Lawful Permanent Residents Entering the United States at a Port of Entry:

Individuals may become Lawful Permanent Residents either through adjustment of status in the United States or when CBP admits them to the United States with an immigrant visa at a port of entry. To obtain a Green Card, these individuals generally must pay the USCIS Immigrant Fee. USCIS then processes the immigrant visa packet and produces the Green Card, which is mailed to the Lawful Permanent Resident following their admission. USCIS will provide information, such as naturalization informational brochures, to CBP for posting/display in an accessible location that permits individuals to retrieve the information. There is no additional personally identifiable information associated with this outreach because it was collected as part of the individual’s immigration petitioning process.

14. U.S. Citizens and Lawful Permanent Residents in Various Stages and Categories of Adoption of Noncitizens, Adoptees Who May Have Acquired Citizenship but Lack a Certificate of Citizenship, and Adoptees Who May Be Eligible for Naturalization:



USCIS will contact adoptive parents with approved adoption-based immigrant petitions, adoptees who may have acquired citizenship but lack a Certificate of Citizenship, and adoptees who may be eligible for naturalization by sending notifications and information on steps required to obtain citizenship to their last known mailing address or email. USCIS will also provide citizenship or naturalization information with the adopted child's Green Card or Green Card expiration notice mailed to their last known address. USCIS may also transmit citizenship and naturalization information to individuals that maintain active USCIS online accounts. USCIS may also contact these individuals via postcard, letters, and outreach and engagement events. USCIS will identify this population by obtaining the following information from the USCIS DID-IT National Processing Workflow Repository (NPWR):

- Adoptee's name;
- Adoptee's A-Number;
- Adoptee's date of birth;
- Adoptee's current age;
- Adoptee's age on February 27, 2001;³⁸
- Date status was granted;
- Immigration Classification (e.g., R-2, IR-4, IH-4);
- Green Card expiration date;
- Record of U.S. Citizenship (issuance of a Certificate of Citizenship, Naturalization, or a U.S. passport);
- Adoptive parent's/parents' name(s);
- Adoptive parent's/parents' U.S. citizenship or immigration status;
- Address (from last form filed; if Form AR-11 filed, that address will also be listed); and
- Email address.

15. USCIS Outstanding Americans by Choice Program:

Established in January 2006, the Outstanding Americans by Choice (ABC) initiative

³⁸ The Child Citizenship Act of 2000 (CCA) amended the Immigration and Nationality Act to create one statutory provision and method for children in the United States to automatically acquire citizenship after birth. Pursuant to Immigration and Nationality Act Section 320, a child born outside of the United States automatically becomes a U.S. citizen when all of the following conditions have been met on or after February 27, 2001: (1) The person is a child of a parent who is a U.S. citizen by birth or through naturalization (including an adoptive parent); (2) the child is under 18 years of age; (3) The child is a Lawful Permanent Resident; and (4) the child is residing in the United States in the legal and physical custody of the U.S. citizen parent.



recognizes the significant contributions and achievements of naturalized U.S. citizens. The Outstanding Americans by Choice recognition is made publicly by USCIS, usually at a naturalization ceremony or other event with the goal of inspiring and encouraging immigrants and citizens alike to participate in their communities and exercise the important rights and responsibilities that accompany U.S. citizenship.

Form G-1579, *Outstanding Americans by Choice Nominee Eligibility Questionnaire*, and Form G-1579A, *Outstanding Americans by Choice Supplemental Questionnaire*,³⁹ are provided to naturalized U.S. citizens who are nominated and/or selected for recognition by the program. Individuals may opt-in to being considered for recognition; there is no requirement to complete the forms. The forms collect personally identifiable information primarily to confirm that the nominee is a naturalized citizen and to determine whether the nominee is eligible for recognition as an Outstanding American by Choice. The forms include a privacy notice indicating that they are voluntary and the purposes for which the information is being collected.

The Form G-1579 collects the following information:

- Nominee's full name;
- Date of birth (for naturalization verification purposes, if needed);
- Physical mailing address;
- Naturalization status (yes/no);
- Naturalization date;
- A-Number (if available);
- Business mailing address (if available);
- Primary phone number;
- Alternate phone number (if available);
- Email address;
- Biography (including photograph);
- Consent to provide remarks at the event;
- Signature (consent authorization);
- Name, title (if applicable), organization (if applicable), and relationship of

³⁹ USCIS Form G-1579, *Outstanding Americans by Choice Nominee Eligibility Questionnaire*, available at: <https://www.federalregister.gov/documents/2022/12/20/2022-27550/agency-information-collection-activities-new-collection-outstanding-americans-by-choice-nominee>.



recognition event guests;

- Number of guests (up to 5);
- Whether the recipient and/or guest require a disability accommodation for the recognition event;
- Consent to being publicly recognized, which may include media interest in the nominee's private life, immigration history, work in the United States, and/or prior country of residence;
- Consent to using the individual's photo, video, or voice recording of remarks given during the recognition event, and social media name on USCIS' website or on other USCIS-specific social media sites without restrictions;
- Type of accommodation(s) requested;
- Consent for future contact involving volunteer activities; and
- Scanned copy of Naturalization Certificate or Passport.

The G-1579A collects the following information:

- Nominee's full name;
- Event availability acknowledgement;
- Leading the Pledge of Allegiance agreement (Yes/No);
- Consent to media interview (including additional events);
- Consent to name appearing on the certificate;
- Name, title, organization, relationship of guests (if applicable); and
- Recipient and/or guests disability accommodation acknowledgement (Yes/No). If "yes", coordination will occur by phone separately.

USCIS will provide the following information regarding the event once recognized as an Outstanding American by Choice recipient:

- Name of event where recognition occurs;
- Date of event; and
- Event venue (city, state).

16. USCIS Citizenship Ambassador Program:

Through targeted outreach, Citizenship Ambassadors engage with Lawful Permanent



Residents to share and promote the rights and responsibilities of citizenship. USCIS selects Citizenship Ambassadors from across the country through an internal selection and open-source information vetting process. If selected, ambassadors will engage with USCIS local and regional staff. They are provided Lawful Permanent Resident statistical data and encouraged to use their existing networks to engage with Lawful Permanent Residents in the community. USCIS trains Citizenship Ambassadors and provides information, printed and electronic materials, and talking points focused on promoting citizenship for use at public engagements.

Form G-1580, *Citizenship Ambassador Nominee Questionnaire*,⁴⁰ collects information on requested nominees, specifically:

- Nominee's full name;
- Date of birth;
- Address (home and work);
- Telephone numbers;
- Email address;
- Naturalization date;
- A-Number;
- Citizenship status and how citizenship was obtained;
- Proof of citizenship (scanned copy of document);
- Consent to USCIS confirming naturalization;
- Naturalization date;
- Consent to permit USCIS to communicate with and provide information to/from assistant/representative;
- Consent to participate in event and be publicly recognized (including media interest in private life, immigration history, U.S. work history, and prior country of residence, if applicable);
- Signature;
- Date of signature;

⁴⁰ Form G-1580, *Citizenship Ambassador Nominee Questionnaire*, available at: <https://www.federalregister.gov/documents/2022/09/21/2022-20395/agency-information-collection-activities-new-collection-outstanding-americans-by-choice-nominee>.



- Proof of citizenship, such as:
 - Naturalization Certificate;
 - U.S. Passport;
 - Certificate of Citizenship;
 - U.S. birth certificate;
 - Consular report of birth abroad (CRBA).

Form G-1580 collects the following information from the Citizenship Ambassador's Assistant/Representative:

- Name;
- Telephone number;
- Email address.

17. Constitution Week Celebration Initiatives:

Citizenship Teacher of the Year Program

As part of our nation's Constitution Week celebration, USCIS honors the unique and critical role that adult education citizenship teachers play in the lives of immigrants, as well as in the communities that welcome them. To recognize the work and dedication of these educators, which includes helping immigrants study for the naturalization test and learn skills and knowledge to help them integrate into their communities and the nation, USCIS will initiate the USCIS Citizenship Teacher of the Year Award Program.

In this program, USCIS will accept recommendation letters from a member(s) of the public nominating citizenship teachers for recognition and/or consideration as the Citizenship Teacher of the Year. Nominations must include the following: (1) Nominee's name and organization where they teach citizenship; (2) opening statement of recommendation; (3) description of how the nominator is familiar with the nominee's work; (4) discussion of why the nominee deserves the recognition; and (5) closing statement of recommendation. The nomination also must include the submission form and release form, which documents that the nominating individual or group advised the prospective nominee and received written consent/release of their information to USCIS prior to submitting the nomination.

The following information will be collected on the nomination form:

Information about the person making the nomination (Nominator)

- The nominator's full name;



- Email address;
- Phone number;
- The question, “How Do You Know the Individual You are Nominating?”

Information about the teacher being nominated (nominee);

- Teacher’s full name;
- Email address;
- Organization name where the teacher teaches citizenship;
- The organization’s street address, city, state, and zip code;
- Whether the teacher is full-time or part-time;
- A question asking, “To the Best of Your Knowledge, Is the Teacher Over the Age of 18”;
- A question asking, “Approximately How Long Has the Teacher Taught Citizenship?”;
- An option for the nominating individual to write “unknown”;
- A statement with a place for signature and date, saying, “To the best of my knowledge, the information I have provided is true and accurate”; and
- Nominee’s consent/release acknowledgement, signature, and date.

Celebration Through the Written Word Program

The Celebration Through the Written Word Program permits anyone residing in the United States, age 18 or older, to submit a piece of writing (e.g., essay, poem) that addresses a subject provided by USCIS. USCIS may share the writings with the public and other federal, state, and local agencies to promote citizenship, immigration, and to celebrate special days of the year. Written Word submissions will involve personally identifiable information collection to assist USCIS with providing proper credit to the author and to ensure USCIS has authorization to use and reprint the written word in external campaigns.

USCIS will notify individuals by phone or email if their writing is selected. USCIS will seek permission from the individual to use the written work and attribute the work to the individual by name. USCIS will provide a Privacy Act Waiver that, if signed, will authorize the disclosure of the writer’s name as a recipient of the recognition.

The following information will be collected for the Celebration Through the Written Word Program:



Information from individuals that submit writings:

- Full name;
- Age (with parental/guardian consent if under 18);
- Email address; and
- Telephone number(s).

Information Submitted by an individual on a Privacy Act Waiver Granting Permission for USCIS to Use Their Name in Association with the Written Word Submission:

- Full name;
- A-Number (if applicable);
- Current address;
- Date of birth;
- Country of birth;
- Organization to receive released information;
- Type of immigration benefit the individual requested and/or maintains (e.g., Lawful Permanent Resident, Refugee, Asylee, Family Based Visa, Employment Based Visa.);
- Signature of individual;
- Date of signature;
- Name of witness; and
- Signature of witness.

Celebration Through Art Program

The Celebration Through Art Program permits anyone residing in the United States, age 18 or older, to submit creative artwork that addresses a subject provided by USCIS. USCIS may share the artwork with the public and other federal, state, and local agencies to promote citizenship, immigration, and to celebrate special days of the year. Creative artwork submissions will involve personally identifiable information collection, including photograph, to assist USCIS in providing proper credit to the artist and to ensure USCIS has authorization to use and reprint artwork in external campaigns. The individual must be willing to sign a release document providing USCIS permission to publish the work along with the individual's name.

USCIS will notify individuals if their artwork is selected. USCIS will seek permission from



the individual to use the artwork and attribute the work to the individual by name. It will also serve as a Privacy Act Waiver authorizing disclosure of their name as a recipient of the recognition. The following information will be collected for the Celebration Through Art Program:

Information from individuals that submit artwork:

- Full name;
- Age (with parental/guardian consent if under 18);
- Email address; and
- Telephone number(s).

Information submitted by individual on Privacy Act Waiver/Artwork Release Authorization (to be developed along with the submission form):

- Full name;
- Current address;
- Date of birth;
- Organization to receive released information;
- Type of immigration benefit the individual requested and/or maintains (e.g., Lawful Permanent Resident, Refugee, Asylee, Family Based Visa, Employment Based Visa) and whether they waive confidentiality to permit their name to be associated with their artwork;
- Disclosure authorization statement to use the artwork;
- Authorization statement to use artist's name;
- Type of artwork submitted;
- Signature of individual;
- Date of signature;
- Name of witness; and
- Signature of witness.

18. New Citizens with myUSCIS Accounts:

USCIS may contact individuals via their myUSCIS Account following their naturalization ceremony to advise them of their voter registration benefit as a U.S. citizen. USCIS may also contact these individuals via text message and/or email to provide outreach and engagement regarding voting-related events.



USCIS will identify this population by obtaining the following information from the USCIS Electronic Immigration System:

- Name;
- A-Number;
- Date of birth;
- Phone number;
- Email address;
- Date of naturalization or citizenship; and
- Address (from last form filed; if AR-11 filed, that address will also be listed).

19. New Citizens without myUSCIS Accounts:

USCIS will send text messages and/or email to naturalized citizens that alert the individual to Vote.gov or a state-specific voter registration site. USCIS will identify this population by obtaining the following information from the USCIS Electronic Immigration System:

- Name;
- A-Number;
- Date of birth;
- Phone number;
- Email address;
- Date of naturalization or citizenship; and
- Address (from last form filed; if AR-11 filed, that address will also be listed).

20. Future Outreach Efforts:

This initiative will continue to expand over time as additional direct communication with individuals or public outreach and engagement activities become available, or as new forms become eligible for online processing. USCIS will continue this outreach and engagement program to inform members of the public about new filing options and methods, benefit document expiration dates, upcoming events, and other important information pertaining to immigration and naturalization/citizenship. USCIS will use the identified data access methods to mitigate the need for new personally identifiable information collection and to reduce the need to include personally identifiable information in the outreach methods and materials. USCIS will also leverage the GovDelivery.com email communication tool to provide information to individuals who have subscribed to the tool and selected specific items of interest pertaining to immigration and/or



naturalization. USCIS will not use GovDelivery.com⁴¹ to send email messages unrelated to the topics selected by the user, actively seek personally identifiable information, or search for or by a personal identifier without a waiver from the DHS Privacy Office or otherwise not specified in this Privacy Impact Assessment. USCIS may also send text messages to individuals using their mobile phone number obtained from previous application filings (if available). USCIS may also leverage/procure commercial data sources (e.g., LexisNexis) to determine and/or verify mailing address accuracy for additional outreach initiatives. USCIS will ensure that any contract entered into with the data broker(s) includes a clause stating that they may not retain the information used in the search function beyond what is needed to produce results. USCIS will submit a Privacy Impact Assessment update for future outreach efforts or if the existing activities require additional personal identifiers for processing purposes.

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?

8 U.S.C. § 1443(h) (section 332(h) of the Immigration and Nationality Act) authorizes the collection, use, and dissemination of the information contained in the Outreach and Engagement Program. Specifically, to promote the opportunities and responsibilities of U.S. Citizenship, USCIS shall broadly distribute information concerning the benefits that individuals may receive and the requirements to obtain such benefits. In carrying out this responsibility, USCIS shall seek the assistance of appropriate community groups, private voluntary agencies, and other relevant organizations.

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

The information collected, used, maintained, and stored in the Outreach and Engagement Program is covered under:

- DHS/USCIS/ICE/CBP-001⁴² Alien File, Index, and National File Tracking System of Records, which accounts for information submitted by individuals who petition for benefits under the INA, and includes petitioner, preparers, and attorneys.

⁴¹ DHS GovDelivery Privacy Policy and Notice, *available at*: <https://www.dhs.gov/govdelivery-privacy-policy-and-notice>.

⁴² See DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 82 FR 43556 (September 18, 2017), *available at*: <https://www.dhs.gov/system-records-notices-sorn>.



- DHS/USCIS-007⁴³ Benefits Information System of Records, which covers individuals who have filed applications or petitions for immigration benefits under the INA.

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

There is no information technology system specific to this outreach and engagement initiative.

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

Yes. The USCIS Outreach and Engagement Program operates under National Archives and Records Administration (NARA) General Records Schedule (GRS) 6.5 Public Customer Service Records Item 020 – Customer/Client Records – DAA-GRS-2017-0002-0002. These records are temporary and will be deleted when superseded, obsolete, or when a customer requests the agency to remove the records. Specific records schedules for the USCIS Electronic Immigration System or other source data sets operate under their own NARA-approved records retention schedules.

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.

This initiative is not subject to the Paperwork Reduction Act (PRA). The forms completed by and provided to USCIS from benefit requestors and applicants operate under their own Paperwork Reduction Act requirements, when applicable.

Section 2.0 Characterization of the Information

2.1 Identify the information the project collects, uses, disseminates, or maintains.

The USCIS Outreach and Engagement Program collects and uses information submitted previously by immigration benefit requestors through various USCIS forms and associated with immigration/naturalization programs. The forms and/or programs collect and use (but are not limited to) the following information:

⁴³ See DHS/USCIS-007 Benefits Information System of Records, 78 FR 70313 (October 10, 2019), *available at*: <https://www.dhs.gov/system-records-notices-sorns>.



Information obtained from USCIS Benefits Mart and Form AR-11 searches:

- Name;
- A-Number;
- Class of admission;
- Green Card expiration date;
- Address (from last form filed; if Form AR-11 filed, that address will also be listed);
- Phone number;
- Email address; and
- Receipt number, form number, and receipt date for the last form filed with USCIS.

USCIS Online Account Creation Outreach:

- Name;
- Phone number;
- Address;
- Email address; and
- Receipt number, form number, and receipt date.

Paper and Online Filing Form I-90, Application to Replace Permanent Resident Card:

- Name;
- A-Number;
- Class of admission;
- Green Card expiration date;
- Address (from last form filed; if Form AR-11 filed, that address will also be listed);
- Phone number;
- Email address; and
- Receipt number, form number, and receipt date for the last form filed with USCIS.

Paper and Online Filing Form I-751, Petition to Remove Conditions on Residence:



- Name;
- A-Number;
- Address;
- Date of admission;
- Class of admission;
- Green Card expiration date;
- Phone number;
- Email address; and
- Receipt number, form number, and receipt date.

Naturalization Test and Test Study Packet Information:

- Name;
- Date of filing;
- Receipt number;
- Address; and
- Email address.

USCIS/General Services Administration (GSA) Office of Evaluation Sciences (OES)
Collaboration (Provided Under Data Sharing Agreement):

- ID Number (Unique ID number to replace the USCIS A-Number for this study);
- Date of birth (month and year);
- Binned (grouped) age when the individual obtained Lawful Permanent Resident status;
- Binned (grouped) Class of Admission (COA) code;
- Country of birth code;
- Binned (grouped) country of birth code;
- Fiscal year when granted Lawful Permanent Resident status;
- Date granted Lawful Permanent Resident status;
- Gender/sex when granted Lawful Permanent Resident status;



- Marital status when granted Lawful Permanent Resident status;
- Country of nationality;
- State of latest residence as Lawful Permanent Resident;
- ZIP code of latest residence as Lawful Permanent Resident;
- Phone number;
- Email address;
- Core-Based Statistical Area based on zip code of latest address as Lawful Permanent Resident;
- USCIS estimate of propensity to file a first N-400 in the next year;
- Date first N-400 was filed/received;
- Determination of whether the first N-400 was filed online or by paper;
- Determination of whether the first N-400 paid the full fee, partial fee, or was fee waived;
- Marital status at naturalization (only Lawful Permanent Residents who filed N-400 and swore or affirmed oaths);
- State of residence at naturalization (only Lawful Permanent Residents who filed N-400 and swore or affirmed oaths);
- ZIP code of residence at naturalization (only Lawful Permanent Residents who filed N-400 and received oaths);
- English test exemption (Yes/No);
- Reading test exemption (Yes/No);
- Writing test exemption (Yes/No);
- Civics test exemption (Yes/No);
- Oral test exemption (Yes/No);
- Request for Evidence sent while processing the N-400 (Yes/No);
- N-648 submitted with N-400 (Yes/No);
- Second interview required (Yes/No);
- Outcome of first N-400 application (Approved, Denied, Withdrawn); and
- Date of first N-400 decision.



Lawful Permanent Resident Data to LexisNexis for USCIS/GSA Office of Evaluation Sciences Collaboration:

- Unique identifier (not the A-Number) assigned by USCIS to distinguish the records;
- Name;
- Truncated Social Security number (Last 4 digits);
- Date of birth;
- Phone number; and
- Past address(es).

Noncitizens with USCIS Online Accounts and Approved Adjustment of Status Applications:

- Name;
- A-Number;
- Date of birth;
- Date Lawful Permanent Resident status is granted;
- Green Card expiration date;
- Address (from last form filed; if Form AR-11 filed, that address will also be listed); and
- Immigration status.

Lawful Permanent Residents with USCIS Online Accounts:

- Name;
- A-Number;
- Date of birth;
- Date Lawful Permanent Resident status granted;
- Lawful Permanent Resident class of admission code (used to denote whether individual is married to a U.S. citizen);
- Green Card expiration date; and



- Address (from last form filed; if Form AR-11 filed, that address will also be listed).

Outreach and Engagement within the Vietnamese Community:

- Name;
- A-Number;
- Date of birth;
- Date Lawful Permanent Resident status is granted;
- Green Card expiration date; and
- Address (from last form filed; if Form AR-11 filed, that address will also be listed).

Specific Outreach and Engagement within Various Groups:

- Name;
- Current benefit type;
- Phone number;
- Address (from last form filed; if Form AR-11 filed, that address will also be listed);
and
- Email address.

Special Immigrant Juveniles:

- Name;
- A-Number;
- Date of birth;
- Date Special Immigrant Juveniles classification or Lawful Permanent Resident status granted;
- Green Card expiration date;
- Address (from last form filed; if Form AR-11 filed, that address will also be listed);
and
- Email address.



Lawful Permanent Residents With Permanent Resident Cards Set to Expire within the Next Six Months (and who have not filed a Form I-90 or N-400):

- Name;
- A-Number;
- Date of birth;
- Date Lawful Permanent Resident status granted;
- Green Card expiration date; and
- Address (from last form filed; if Form AR-11 filed, that address will also be listed).

Lawful Permanent Residents who have filed Form I-90:

- Name;
- A-Number;
- Date of birth;
- Date Lawful Permanent Resident status granted;
- Green Card expiration date; and
- Address (from last form filed; if Form AR-11 filed, that address will also be listed).

Violence Against Women Act (VAWA) Self-Petitioners, U, And T Non-Immigrant Visa Status Holders with Approved Adjustment of Status who do not have USCIS Online Accounts:

- 8 U.S.C. § 1367 Flag;
- Name;
- A-Number;
- Date of birth;
- Date status is granted;
- Green Card expiration date; and
- Address (from last form filed; if Form AR-11 filed, that address will also be listed).

Asylees and Refugees:



- Name;
- A-Number;
- Date of birth;
- Date status is granted;
- Green Card expiration date; and
- Address (from last form filed; if Form AR-11 filed, that address will also be listed).

Noncitizens Pending Adjustment of Status without USCIS Online Accounts:

- Name;
- A-Number;
- Date of birth;
- Green Card expiration date; and
- Address (from last form filed; if Form AR-11 filed, that address will also be listed).

Lawful Permanent Residents Entering the United States at a Port of Entry:

- USCIS will provide information, such as naturalization informational brochures, to CBP for posting/display in an accessible location that permits individuals to retrieve the information. There is no personally identifiable information associated with this outreach.

U.S. Citizens and Lawful Permanent Residents in Various Stages and Categories of Adoption of Noncitizens, Adoptees Who May Have Acquired Citizenship but Lack a Certificate of Citizenship, and Adoptees Who May Be Eligible for Naturalization:

- Adoptee's name;
- Adoptee's A-Number;
- Adoptee's date of birth;
- Adoptee's current age;
- Adoptee's age on February 27, 2001;
- Date status was granted;



- Immigration classification (e.g., Alien Child Adoption statuses IR-2,⁴⁴ IR-4,⁴⁵ IH-4⁴⁶);
- Green Card expiration date;
- Record of U.S. Citizenship (issuance of a Certificate of Citizenship, Naturalization, or a U.S. passport);
- Adoptive parent's/parents' name;
- Adoptive parent's/parents' U.S. citizenship or immigration status;
- Address (from last form filed; if Form AR-11 filed, that address will also be listed); and
- Email address.

Additionally, USCIS may access the data listed above from forms that include, but are not limited to:

- Form I-90 – Application to Replace Permanent Resident Card (Green Card);
- Form I-130 – Petition for Alien Relative;⁴⁷
- Form I-360 – Petition for Amerasian, Widow(er), or Special Immigrant;⁴⁸
- Form I-485 – Application to Register Permanent Residence or Adjust Status;⁴⁹
- Form I-600 – Petition to Classify Orphan as an Immediate Relative;⁵⁰ and
- Form I-800 – Petition to Classify Convention Adoptee as an Immediate Relative.⁵¹

⁴⁴ Immigration classification/VISA status IR-2 is a visa granted to an alien defined as a child and if the child: (1) Was adopted while under the age of 16 (or is the natural sibling of such child who was adopted by the same parents while under the age of 18); and (2) Has been in the legal custody of, and has resided with, the adopting parent(s) for two years.

⁴⁵ Immigration classification/VISA status IR-4 is designed for children who are in the midst of the foreign adoption process. This IR-4 visa allows the child to enter and live in the United States before the entire adoption process has been completed.

⁴⁶ Immigration classification/VISA status IH-4 is a visa are issued by a U.S. embassy or consulate if and individual (and their spouse if married) did not complete a final adoption abroad before the child enters the United States, or only one parent of a married couple adopted the child abroad.

⁴⁷ USCIS Form I-130, Petition for Alien Relative, *available at*: <https://www.uscis.gov/i-130>.

⁴⁸ USCIS Form I-360, Petition for Amerasian, Widow(er), or Special Immigrant, *available at*: <https://www.uscis.gov/i-360>.

⁴⁹ USCIS Form I-485, Application to Register Permanent Residence or Adjust Status, *available at*: <https://www.uscis.gov/i-485>.

⁵⁰ USCIS Form I-600, Petition to Classify Orphan as an Immediate Relative, *available at*: <https://www.uscis.gov/i-600>.

⁵¹ USCIS Form I-800, Petition to Classify Convention Adoptee as an Immediate Relative, *available at*: <https://www.uscis.gov/i-800>.



USCIS Outstanding Americans by Choice Program:

- Nominee's full name;
- Date of birth;
- Physical mailing address;
- Naturalization status (yes/no);
- Naturalization date;
- A-Number (if available);
- Business mailing address (if available);
- Phone number(s);
- Email address;
- Biography (including photograph);
- Consent to provide remarks at the event;
- Signature;
- Name, title (if applicable) organization (if applicable), and relationship of recognition event guests;
- Number of guests (up to 5);
- Whether the recipient and/or guest require a disability accommodation for the recognition event;
- Consent to being publicly recognized;
- Consent to use the individual's photo, video, or voice recording of remarks given during the recognition event, and social media name on USCIS' website or on other USCIS-specific social media sites without restrictions;
- Type of accommodation(s) requested;
- Consent for future contact involving volunteer activities;
- Scanned copy of Naturalization Certificate or Passport;
- Event availability acknowledgement;
- Leading the Pledge of Allegiance agreement (Yes/No);
- Consent to media interview (including additional events); and



- Consent to name appearing on the certificate.

USCIS Citizenship Ambassador Program:

- Nominee's full name;
- Date of birth;
- Address(es);
- Telephone numbers;
- Email address;
- Naturalization date;
- A-Number;
- Country of birth and/or country of last habitual residence;
- How citizenship was obtained;
- Proof of Citizenship (scanned copy of document);
- Consent to USCIS confirming citizenship status;
- Naturalization date;
- Consent to permit USCIS to communicate with and provide information to/from Assistant/Representative;
- Consent to participate in event and be publicly recognized;
- Signature;
- Date of signature;
- Proof of citizenship, such as:
 - Naturalization Certificate;
 - U.S. Passport;
 - Certificate of Citizenship;
 - U.S. birth certificate;
 - Consular report of birth abroad (CRBA).
- Name of requested assistant/representative;



- Telephone number; and
- Email address.

Citizenship Teacher of the Year Program:

- Nominator's full name;
- Nominator's email address;
- Nominator's phone number;
- Information as to how nominator knows nominee;
- Nominee/teacher's full name;
- Teacher's email address;
- Organization name where the teacher teaches citizenship;
- The organization's street address, city, state, and zip code;
- Information regarding whether the teacher's employment is full-time or part-time, whether the nominator believes the teacher is over the age of 18, and how long the teacher has been teaching citizenship;
- "To the best of my knowledge, the information I have provided is true and accurate" with accompanying signature and date; and
- Consent/release acknowledgement, signature, and date.

Celebration Through the Written Word Program:

- Full name of individual submitting the writing;
- Age (if under 18);
- Email address;
- Telephone number(s);
- A-Number (if applicable);
- Current address;
- Date of birth;
- Country of birth;



- Organization to receive released information;
- Type of immigration benefit the individual requested and/or maintains;
- Signature of individual;
- Date of signature;
- Name of witness; and
- Signature of witness.

Celebration Through Art Program:

- Full name;
- Age (age 18 or over);
- Email address;
- Telephone number(s);
- Current address;
- Date of birth;
- Organization to receive released information;
- Type of immigration benefit the individual requested and/or status the individual currently maintains, and whether they waive confidentiality to permit their name to be associated with their artwork;
- Disclosure authorization statement to use the artwork;
- Authorization statement to use artist's name;
- Type of artwork submitted;
- Signature of individual;
- Date of signature;
- Name of witness; and
- Signature of witness.

New Citizens with myUSCIS Accounts:

- Name;



- A-Number;
- Date of Birth;
- Date of naturalization or citizenship; and
- Address (from last form filed; if AR-11 filed, that address will also be listed).

New Citizens without myUSCIS Accounts:

- Name;
- A-Number;
- Date of birth;
- Date of naturalization or citizenship; and
- Address (from last form filed; if AR-11 filed, that address will also be listed).

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

Information collected and maintained by USCIS for outreach and engagement purposes originates from data received previously from immigration benefit requestors seeking a myriad of immigration and/or naturalization benefits, status designations, or programs. USCIS will use personally identifiable information from immigration benefit forms previously submitted to USCIS and stored on the USCIS SAS (not an acronym) Predictive Modeling Environment (SAS PME)⁵² server but may require data obtained from the USCIS Electronic Immigration System, Computer Linked Application Information Management System and Associated Systems, Benefits Mart (Enterprise Citizenship and Immigrations Services Centralized Operational Repository (eCISCOR)), Person Centric Query Service, Central Index System 2, Form AR-11 and other filed forms, the myUSCIS portal, and the DID(it) National Processing Workflow Repository. Additionally, USCIS' outreach efforts for online filing do not collect personally identifiable information from the communications sent to the public, and they do not include personally identifiable information in the communications with the public, though they are supported by personally identifiable information already available in USCIS systems.

USCIS may also use information collected by and provided to USCIS by other Department of Homeland Security Components, such as CBP, as part of its outreach and engagement activities

⁵² See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR SAS PREDICTIVE MODELING ENVIRONMENT (SAS PME), DHS/USCIS/PIA-055, *available at*: <https://www.dhs.gov/uscis-pias-and-sorns>.



directed at individuals who have applied for or may be eligible for certain immigration benefits. Information received from other Components will be used strictly for the specific outreach and engagement program and will be deleted after one year. Further, USCIS will not share information with other Components.

2.3 Does the project use information from commercial sources or publicly available data? If so, explain why and how this information is used.

To facilitate the GSA Office of Evaluation Sciences study, USCIS contracted with LexisNexis to enable USCIS to ensure it has the most up to date address information for the Lawful Permanent Residents who may be contacted as part of naturalization outreach initiatives. LexisNexis has updated address information from publicly available sources. LexisNexis maintains the Accurint system which has access to over 84 billion public records from over 10,000 diverse sources, comprising public, private, regulated, emerging and derived data. To enable this search of the Accurint system, USCIS established a contract with LexisNexis under which USCIS will provide selected information on Lawful Permanent Residents to LexisNexis and they will complete the Accurint search to identify the updated address information. As noted previously, USCIS cannot access or use the Accurint search tool within the USCIS environment. USCIS use of current address information provided by LexisNexis will ensure that the GSA Office of Evaluation Sciences has access to the most accurate data possible to complete the study. Individuals granted certain protections under Title 8, U.S.C., Section 1367 are excluded from the study. The information gathered for this purpose will not be shared with any other agency or used for any other purpose. USCIS will ensure that this and any other contract entered into with any data broker(s) for this study includes a clause stating that they may not retain the information used in the search function beyond what is needed to produce results. USCIS will submit a Privacy Impact Assessment update for future outreach efforts or if the existing activities require additional personal identifiers for processing purposes.

USCIS may pursue additional opportunities to leverage commercial data sources such as LexisNexis to verify or update mailing addresses and/or other contact information to ensure that outreach and engagement activities reach intended recipient(s). As noted previously, if this occurs, USCIS will update this Privacy Impact Assessment.

2.4 Discuss how accuracy of the data is ensured.

The data obtained for outreach and engagement activities originates primarily from the USCIS Electronic Immigration System. The USCIS Electronic Immigration System ensures data accuracy primarily by using data entered directly by the requestor through various form submissions whenever possible. All requests filed using USCIS online accounts are completed directly by the benefit requestor or the requestor's legal representative. Benefit requestors can



correct any information in their benefit request forms up to the point that they sign and submit the filing. After the benefit request has been submitted, the only changes the benefit requestor may make are at the account level, such as updating an email address or other contact information. When inputting data from a paper filing, USCIS Lockbox facilities employ quality control measures, including levels of review to prevent keying errors and verifying scan quality. In general, in the event of an error, the requestor can correct certain data using existing correction processes, such as contacting USCIS National Customer Service Center (NCSC) and those correction processes provided in the source system Privacy Impact Assessments and System of Records Notices.

The USCIS Electronic Immigration System systematically checks submitted biographical data (e.g., name, date of birth, place of birth, gender) against data from other USCIS systems to assist adjudicators with identifying inaccurate data supplied by the requestor or correcting inaccurate data in legacy systems. USCIS gives individuals opportunities during and after the completion of the application process to correct information they have provided and to respond to information received from external sources.

USCIS employs stringent quality control measures at its field locations (e.g., Service Center Operations and Field Office Directorates) and the National Benefits Center (NBC) by collecting information directly from the individual or their representative. USCIS employees must verify the identity of a person inquiring about a specific application or petition. For in-person inquiries, individuals must provide a government-issued identity document (e.g., passport, driver's license) so that USCIS can verify their identity. For inquiries not received in person (for example, those received through telephone call or email), it may be difficult to verify the identity of the person making the request through use of a government-issued document. In these cases, USCIS asks for specific identifying information about the case to ensure that it is appropriate to communicate case-specific information. Examples of identifying information include, but are not limited to, receipt numbers, A-Numbers, full names, dates of birth, email addresses, and physical addresses. If a person is unable to provide identifying information that an applicant, petitioner, or representative should reasonably know, USCIS employees may refuse to respond to the request, direct the requestor to make an appointment at a local field office, or create a myUSCIS account.

Data sharing with GSA will operate under USCIS and federal guidelines and/or clauses that safeguard personally identifiable information entrusted to both agencies. Data sharing with LexisNexis will operate under USCIS and federal guidelines and/or clauses that safeguard personally identifiable information and sensitive personally identifiable information entrusted to both agencies.

2.5 Privacy Impact Analysis: Related to Characterization of the Information



Privacy Risk: There is a risk that the information may be used for purposes other than for which it was collected originally.

Mitigation: This risk is mitigated. USCIS limits the use of this information to outreach and engagement activities associated with immigration and/or naturalization programs that may be of interest to the individual or based on the individual's current immigration status. Since immigration and naturalization are processes that may require multiple interactions using various forms, USCIS seeks to contact individuals during the normal course of their immigration lifecycle.

Additionally, data will be shared outside of DHS (with the GSA Office of Evaluation Sciences, GSA contract employees and LexisNexis). Data shared with the GSA Office of Evaluation Sciences will be de-identified and minimized to the maximum extent practicable and the data sharing agreement between USCIS and the GSA Office of Evaluation Sciences contains limitations on the data uses. Data shared with LexisNexis will be minimized to the maximum extent practicable and the data sharing agreement between USCIS and LexisNexis contains limitations on the data uses.

Privacy Risk: There is a risk that the program may collect more information than what is necessary to identify individuals, determine their immigration status, and contact them for benefit program awareness purposes.

Mitigation: This risk is mitigated. USCIS only uses information collected previously during the benefit/form submission process and is not obtaining additional information from individuals. In certain instances, when necessary, USCIS will obtain the A-Number to verify identity to ensure that the information pertains to the correct individual and maps to their most recent contact information. USCIS personnel will only collect enough information to verify identities, confirm their immigration status, and provide tailored information regarding potential immigration or naturalization benefits. The risk is further mitigated by USCIS designing the USCIS Electronic Immigration System specifically to collect and store only the information that is necessary to adjudicate the benefit request forms processed by USCIS. Additionally, individuals can overwrite and correct any information in their applications up to the point that they sign and submit the application. After it has been submitted, the customer may login to their account and automatically make changes that have no substantive bearing on the adjudication, such as updating an email address or other contact information.

Privacy Risk: There is a risk that the information provided on the immigration form is inaccurate.

Mitigation: This risk is mitigated. USCIS relies on the accuracy of the information provided by the immigration/benefit requestor and/or legal representatives. Prior to submitting an immigration request form, requestors must certify on the respective forms that the information submitted is true and correct. USCIS presumes the information submitted is accurate and verifies



the information against multiple sources during the review process. USCIS also gives individuals opportunities during and after the completion of the immigration request process to correct information they have provided. Additionally, individuals are encouraged regularly on various USCIS websites to maintain a current address with USCIS. The USCIS website provides information and resources to assist customers in maintaining an accurate address on file with USCIS.⁵³

Section 3.0 Uses of the Information

3.1 Describe how and why the project uses the information.

To conduct outreach and engagement activities for benefit requestors, USCIS uses the specific categories of personally identifiable information listed in the Overview and Section 2.1 above for each engagement to identify individuals, determine their current immigration status and next steps in immigration life cycle, obtain critical expiration dates (e.g., Green Card expiration date), and obtain their contact information to complete the outreach/engagement activity. In certain cases, and depending on which USCIS system maintains the information, the data required to conduct outreach and engagement activities varies. There are instances when USCIS requires the A-Number to determine identities and view the immigration file to know which benefits, programs, or opportunities may be of interest to the individual.

For U.S. citizens and Lawful Permanent Residents in various stages and categories relating to the adoption of noncitizens, adoptees who may have acquired citizenship but lack a Certificate of Citizenship, and adoptees who may be eligible for naturalization, USCIS collects a different subset of personally identifiable information (also listed in the Overview and Section 2.1 above) to determine their identity and biographic data, contact information, date status was granted, and immigration classification category. USCIS will also collect the adoptive parents' or parent's name(s) and citizenship or immigration status. This information will permit USCIS to obtain the minimal information needed to identify the adoptee and the adoptive parents, and the adoptee's current age, which may help determine whether it is beneficial to the individual and/or USCIS to engage with the adoptee, who may not know that they were adopted.

USCIS will seek services from the GSA Office of Evaluation Sciences to collaborate on a study to determine the effectiveness of USCIS naturalization promotion efforts. USCIS plans to share de-identified data with the GSA Office of Evaluation Sciences on characteristics such as age, sex, location, immigration status, years of U.S. residency, and means-tested benefits status, mapped to the intervention received.

⁵³ USCIS Change of Address Website, available at: <https://www.uscis.gov/addresschange>.



USCIS will seek services from LexisNexis to determine current addresses of individuals for the GSA Office of Evaluation Sciences study. Individuals granted certain protections under Title 8, U.S.C., Section 1367 are excluded from the study.

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 anomaly? If so, state how DHS plans to use such results.

The USCIS Outreach and Engagement Program and the forthcoming study and services provided by the GSA Office of Evaluation Sciences will perform or involve queries, searches, or other analyses to discover or locate a predictive pattern or anomaly.

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

There are no other DHS Components associated with this initiative.

3.4 Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: There is a risk that USCIS may contact individuals who have no desire to pursue additional immigration and/or naturalization benefits or opportunities.

Mitigation: This risk is partially mitigated. USCIS mitigates this risk by permitting individuals to voluntarily decline or opt-out of receiving extraneous benefit announcements and/or outreach and engagement initiatives that are not associated directly with the individual's current immigration or naturalization status (e.g., critical Green Card expiration date notices). As USCIS forms are updated, USCIS will add opt-in statements on each relevant form seeking the individual's authorization to be contacted for additional immigration and/or naturalization benefits, programs, or opportunities. USCIS permits individuals contacted via the myUSCIS Portal to unsubscribe from future notifications.

Privacy Risk: There is a risk that the USCIS Outreach and Engagement Program may collect and use information in a manner inconsistent with USCIS' authority and mission.

Mitigation: This risk is mitigated. Part of USCIS' statutory mission under 8 U.S.C. § 1443(h) (section 332(h) of the Immigration and Nationality Act) is to broadly distribute educational information concerning immigration and naturalization benefits that individuals may be eligible to receive and the requirements to obtain such benefits. USCIS mitigates this risk by limiting the amount of personally identifiable information that outreach and engagement personnel may access and obtain from existing systems and/or sources to only that information needed to identify individuals, determine their immigration status, and to contact them for benefit program awareness purposes only. To ensure the information is used consistently with the purposes of the



original collection, USCIS administrators monitor internal user logs of source systems to ensure users are only accessing information related to their official duties. This risk is also mitigated by requiring all USCIS personnel to complete annual Privacy Awareness Training and agree to follow Rules of Behavior. USCIS Electronic Immigration System users also receive data handling training on modules pertaining to individual forms within the system.

Section 4.0 Notice

4.1 How does the project provide individuals notice prior to the collection of information? If notice is not provided, explain why not.

This Privacy Impact Assessment provides notice to individuals regarding the USCIS Outreach and Engagement Program. USCIS currently maintains various applications and/or forms from benefit requestors, which are in various stages of the immigration lifecycle. Since each form an individual may submit to USCIS contains notice pertaining to the particular benefit requested, USCIS will only permit access to source records for outreach and engagement purposes internally to employees specifically assigned to provide information to benefit requestors as part of their statutory duties under 8 U.S.C. § 1443(h). This information includes but is not limited to updates regarding current statuses, critical expiration dates, and awareness regarding additional immigration and/or naturalization benefit opportunities. Additionally, the Privacy Act System of Records Notices (SORN) for the source systems governing this program provide additional notice within their designated Routine Uses by identifying the external entities and the purposes for which USCIS may use and share the information. USCIS will also place notice on its outreach and engagement webpages on uscis.gov regarding USCIS contacting individuals in the future regarding current or potential benefits and opportunities.

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

The source information used by the Outreach and Engagement Program originates from data maintained currently by USCIS. Participation in outreach and engagement activities is completely voluntary though benefit requestors may receive initial unsolicited outreach to advise them about available web-based tools, critical deadlines, and next steps in the immigration process. As noted previously, individuals currently opt out of receiving non-essential information (with an opt-in option anticipated for future forms).

4.3 Privacy Impact Analysis: Related to Notice

Privacy Risk: There is a risk that individuals may not know that USCIS may share their



information with appropriate internal and external personnel that have a need for the information in the performance of official statutory duties to broadly distribute immigration and naturalization educational information and benefit opportunities and assess the results of those efforts.

Mitigation: This risk is partially mitigated. USCIS mitigates this risk by publishing this Privacy Impact Assessment and taking additional steps to notify benefit requestors about its outreach and engagement efforts through other notice and/or through the My Options feature in the myUSCIS⁵⁴ online accounts portal, and provides additional awareness information through mailings, multi-media, and agency social media sites. USCIS continues to migrate benefit requestors to online accounts and eliminate paper-based processes, though continues to offer paper-based processes for individuals who require or choose this option. These actions will provide additional opportunities for individuals to opt-in to receiving tailored outreach and engagement information. Additionally, the Privacy Act, 5 U.S.C. § 552a(b)(1) permits DHS to share information internally with individuals who have a need for the information in the performance of official duties.

Section 5.0 Data Retention by the Project

5.1 Explain how long and for what reason the information is retained.

The information retained for the USCIS Outreach and Engagement Program is a subset of information previously obtained during the immigration benefit request process and/or associated with an individual's naturalization. This information pertains to identity verification data and contact information related to outreach and engagements. USCIS retains this information in accordance with the National Archives and Records Administration's (NARA) General Record Schedule 6.5 – Public Customer Service Records, Item 020, Customer/Client Records (DAA-GRS-2017-0002-0002). These records are temporary and are deleted when superseded, obsolete, or when individuals request the agency to remove the records. Specific records schedules for data collected originally from the applications and petitions submitted by benefit requestors that are stored in the USCIS Electronic Immigration System or other source systems operate under their own NARA-approved records retention schedules.

The GSA Office of Evaluation Sciences will delete record copies of data from all places where they are stored and provide verification, in writing, to USCIS of the manner and date of deletion within three (3) years after the cut-off (as described in the data sharing agreement) or

⁵⁴ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE myUSCIS PLATFORM, DHS/USCIS/PIA-064, *available at*: <https://www.dhs.gov/uscis-pias-and-sorns>.



when no longer needed for business purposes, whichever is longer.

5.2 Privacy Impact Analysis: Related to Retention

Privacy Risk: There is a risk that information collected for outreach and/or engagement activities may be retained for longer than necessary.

Mitigation: This risk is mitigated. USCIS mitigates this risk by deleting the information when no longer necessary, as required by NARA General Records Schedule 6.5, or upon an individual opting out of participating in or receiving additional outreach and engagement information. Source system data operates under activity-specific records retention schedules.

As described in the data sharing agreement between USCIS and the GSA Office of Evaluation Sciences, GSA will delete record copies of data from all places where it is stored and provide verification, in writing, to USCIS of the manner and date of deletion within three (3) years after the cut-off or when no longer needed for business purposes, whichever is longer (agreement contains stipulations regarding cut-off date).

Section 6.0 Information Sharing

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 does not share this information outside of DHS in the normal course of its outreach and engagement activities. However, information will be shared with the GSA Office of Evaluation Sciences as part of the naturalization outreach evaluation initiative. Information shared with the GSA Office of Evaluation Sciences, as documented in the information data sharing agreement, will remain USCIS/DHS-owned data in the same manner as information managed by other contracted/vendor service providers.

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

Sharing USCIS data with the GSA Office of Evaluation Sciences is compatible with the purpose of the system because 8 U.S.C. § 1443(h) authorizes public education regarding naturalization benefits.

- Routine Use F of the Alien File, Index, and national File Tracking System of Records Notice permits USCIS to share information with contractors and their agents, grantees, experts, consultants, and others performing or working on a contract, service, grant, cooperative agreement, or other assignment for DHS, when necessary to accomplish



an agency function related to this system of records. Individuals provided information under this routine use are subject to the same Privacy Act requirements and limitations on disclosure as are applicable to DHS officers and employees.

- Routine Use H of the Benefits Information System System of Records Notice permits USCIS to share information with contractors and their agents, grantees, experts, consultants, and others performing or working on a contract, service, grant, cooperative agreement, or other assignment for DHS, when necessary to accomplish an agency function related to this system of records. Individuals provided information under this routine use are subject to the same Privacy Act requirements and limitations on disclosure as are applicable to DHS officers and employees.

6.3 Does the project place limitations on re-dissemination?

Yes, as part of the naturalization outreach evaluation initiative and as documented in the information data sharing agreement, the GSA Office of Evaluation Sciences may not permanently retain or disclose to any third party any information obtained from or provided by USCIS, unless they have obtained written permission from USCIS. Also, as part of the naturalization initiative, LexisNexis authorized users will not disclose or release any information without proper authority or authorization as discussed in the LexisNexis and DHS/USCIS contract and associated documentation.

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

USCIS maintains a record of disclosures of data shared with the GSA Office of Evaluation Sciences and Lexis Nexis as part of the naturalization outreach evaluation initiative by using a spreadsheet to account for disclosures.

6.5 Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk that data shared by USCIS with external partners will be used beyond the original purpose of collection.

Mitigation: This risk is mitigated. USCIS is careful to share data with external partners that have a need to know and will only use information for purposes that are compatible with the relevant USCIS System of Records Notices. Additionally, USCIS documents these safeguards in data sharing agreements with the external partners, such as the agreement between USCIS and the GSA Office of Evaluation Sciences as well as the contract between USCIS and LexisNexis. All prospective information handlers must be authorized to access the information and the GSA Office of Evaluation Sciences and LexisNexis limit the access to the minimum number of authorized users required to complete the initiative. In addition, the GSA Office of Evaluation Sciences and



LexisNexis will monitor system access to ensure that information is not inappropriately retained, accessed, or disclosed without USCIS approval and that the data shared will be used only for the purposes listed in the data sharing agreement.

Section 7.0 Redress

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

An individual may seek access to their USCIS records by filing a Privacy Act or Freedom of Information Act (FOIA) request. Only U.S. citizens, Lawful Permanent Residents, and covered persons from a covered country under the Judicial Redress Act (JRA) may file a Privacy Act request. Individuals not covered by the Privacy Act or the Judicial Redress Act may still obtain access to records consistent with FOIA unless disclosure is prohibited by law or if the agency reasonably anticipates that disclosure would harm an interest protected by an exemption. If an individual would like to file a Privacy Act or FOIA request to view their USCIS record, they may mail the request to the following address:

National Records Center
Freedom of Information Act (FOIA)/Privacy Act Program
P. O. Box 648010
Lee's Summit, MO 64064-8010

Some information requested may be exempt from disclosure under the Privacy Act or FOIA because, for instance, information may contain law enforcement sensitive information, the release of which could possibly compromise ongoing criminal investigations. Further information about Privacy Act and FOIA requests for USCIS records is available at <http://www.uscis.gov>.

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

U.S. citizens and Lawful Permanent Residents, as well as other persons with records covered by Judicial Redress Act, may correct information by filing a Privacy Act Amendment request under the Privacy Act. U.S. citizens, Lawful Permanent Residents, and persons covered by the Judicial Redress Act should submit requests to contest or amend information contained in USCIS systems to the USCIS FOIA/PA Office. Individuals must state clearly and concisely in the redress request the information being contested, the reason for contesting it, the proposed amendment, and clearly mark the envelope "Privacy Act Amendment." This would only apply to amendment of USCIS-held information. Persons not covered by the Privacy Act cannot amend their records through FOIA. Should a non-U.S. person find inaccurate information in their record received through FOIA, they may visit a local USCIS Field Office to identify and amend inaccurate



records with supporting evidence. Visit <https://www.uscis.gov/about-us/find-a-uscis-office/field-offices>.

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

USCIS notifies individuals of the procedures for correcting their information in this Privacy Impact Assessment, source systems' Privacy Impact Assessments and System of Records Notices, Privacy Notices on associated forms, and through the USCIS website. Specifically, the System of Records Notices listed in Section 1.2 provide individuals with guidance regarding the procedures for correcting information. Privacy Notices, including notice of an individual's right to correct information, are also contained on the instructions to immigration forms published by USCIS.

7.4 Privacy Impact Analysis: Related to Redress

There is no risk associated with redress. USCIS provides individuals with access to their records that are not subject to exemptions when requested through a FOIA or Privacy Act request. Individuals who are U.S. citizens or Lawful Permanent Residents may submit a Privacy Act request to contest or amend information. Any person, regardless of immigration status, can come to a USCIS Field Office to update their records using supporting evidence.

Section 8.0 Auditing and Accountability

8.1 How does the project ensure that the information is used in accordance with stated practices in this PIA?

USCIS ensures that the practices stated in this Privacy Impact Assessment are followed by providing training, promulgating policies and rules of behavior, and auditing and accountability. USCIS established access and security controls to mitigate privacy risks associated with authorized and unauthorized uses, namely misuse and inappropriate dissemination of data. DHS security specifications require auditing capabilities that log the activity of each user to reduce the possibility of misuse and inappropriate dissemination of information. USCIS tracks all user actions via audit logs to identify audit 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. In addition, the GSA Office of Evaluation Sciences and LexisNexis monitor system access to ensure that information is not inappropriately retained, accessed, used, or disclosed, as documented in the relevant data sharing agreements.



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

All USCIS employees and contractors are required to complete annual privacy and security awareness training. These trainings address appropriate privacy safeguards, including Privacy Act obligations, and examine appropriate technical, physical, personnel, and administrative controls to safeguard information. In addition, the GSA Office of Evaluation Sciences and LexisNexis ensure that their employees and contractors with access to any of the information have completed privacy training on the handling of personally identifiable information/sensitive personally identifiable information, including information on applicable laws, regulations, and policies related to information privacy and security.

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 deploys role-based access controls and enforces a separation of duties throughout each system that maintains the data. Access is limited to only those persons who have a need to know to perform their official duties. This need to know is determined by the job responsibilities for each employee. Employees are only granted access to their production and case information. Supervisors can access their respective employees' production and case information.

The GSA Office of Evaluation Sciences and LexisNexis ensure Authorized Users possess a valid mission need for the information and access is limited to the minimum number of Authorized Users required to complete the specific initiatives outlined in the relevant data sharing agreement.

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 does not share Outreach and Engagement Program data with external entities in the normal course of operations. However, the GSA Office of Evaluation Sciences will perform services to evaluate USCIS' outreach and engagement activities to enable USCIS to design program modifications aimed at identifying and reducing barriers to naturalization and making meaningful improvements to the naturalization process. USCIS and the GSA Office of Evaluation Sciences entered a data sharing agreement to formalize deliverables and expectations and to share and publish study results. As part of that process, USCIS will also share data with LexisNexis to obtain current contact information. The USCIS Outreach and Engagement Program is subject to the USCIS formal review process for any data sharing agreements. That process includes, at a minimum, review by the DHS Privacy Office, Office of the General Counsel, Office for Civil



Rights and Civil Liberties, USCIS Privacy Office, USCIS Office of Chief Counsel, Office of the Chief Information Officer, and respective program officials entrusted with security of the data.

Responsible Official

Angela Washington
Privacy Officer
U.S. Citizenship and Immigration Services
(202) 272-8030

Approval Signature

Original, signed copy on file at the DHS Privacy Office

Mason C. Clutter
Chief Privacy Officer
U.S. Department of Homeland Security
(202) 343-1717