Privacy Impact Assessment
for the

Citizenship and Integration Grant Program

DHS/USCIS/PIA-066

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Abstract

The Department of Homeland Security (DHS), U.S. Citizenship and Immigration Services (USCIS), Office of Citizenship (OoC), is charged with promoting instruction and training on the rights and responsibilities of citizenship. Through the Citizenship and Integration Grant Program, USCIS funds community-based organizations striving to professionalize and increase services to individuals in the area of citizenship instruction or naturalization application services. USCIS is conducting this Privacy Impact Assessment (PIA) because the Citizenship and Integration Grant Program collects, uses, and maintains personally identifiable information (PII).

Overview

The Citizenship and Integration Grant Program is a major part of U.S. Citizenship and Immigration Services (USCIS) efforts to support effective citizenship preparation services and provide information to immigrants and public or private nonprofit organizations. Every year, USCIS accepts applications for the Citizenship and Integration Grant Program, a competitive grant funding opportunity for organizations that prepare permanent residents for naturalization and promote civic integration through increased knowledge of civics (United States history and government) and English (reading, writing, and speaking). USCIS recognizes that naturalization is an important milestone in the civic integration of immigrants.

The Citizenship and Integration Grant Program is part of a multifaceted effort to provide citizenship preparation resources, support, and information to immigrants and immigrant-serving organizations. Recipients are public or private nonprofit organizations with recent experience providing citizenship instruction and naturalization application services to eligible lawful permanent residents. They include public school systems, public libraries, community and faith-based groups, adult education organizations, and literacy organizations.

The goal of the Citizenship and Integration Grant Program is to provide support to community-based organizations in their efforts to establish new citizenship instruction programs or expand the quality and reach of existing citizenship instruction programs. Through this funding, USCIS funds community-based organizations striving to professionalize and increase services to immigrants in the area of citizenship instruction or naturalization application services.

OoC posts Form G-1482, *Citizenship and Integration Grant Program, Notice of Funding Opportunity,* to grants.gov.[1] To apply, applicants are required to complete Form Standard Form (SF)-424, *Application for Federal Assistance* and Form SF-424A, *Budget* in accordance with the application instructions on grants.gov. Information collected about the organization includes the

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[1] https://www.grants.gov.

organizational name, address, and type of organization (*e.g*., community/faith based organization public school, public library, adult education program). Information collected about the Head of the Organization Authorized Official or Grant Project Manager includes name, title, address, phone number, and email address. Applicants are also required to provide the names and resumes of key personnel in their application package. The notice of funding opportunity instructs applicants to provide a number of documents (including, project narrative, budget table and narrative, resumes of key personnel) to be reviewed and scored according to the published evaluation criteria during the USCIS technical Review process. USCIS requests resumes to assess an organization's capacity to provide citizenship instruction and naturalization application services. Grant applicants upload their complete application packages through grants.gov.

OoC downloads the application packages from grants.gov and stores the packages on a secured shared drive. After the initial eligibility review is completed, eligible applications are assigned to independent technical review panels comprised of USCIS personnel. These technical reviewers use the published selection criteria (originally published on grants.gov) to score their assigned applications. Technical reviewers score each application package. USCIS ranks the order of the applications under each funding opportunity based on their average scores. The USCIS internal review panel then determines the final list of recipients based on the rank order as well as the published strategic program priorities found in the notice of funding opportunity. Before making final funding decisions, OoC conducts negotiations with the highest ranking applicants. OoC then compiles a final list of grant recipients.

Grant Recipient Collaboration Tool

OoC built the Grant Collaboration Tool, a customer relationship management system, to securely communicate and interact with grant recipients. Grant recipients use the collaboration tool to send and receive secure communications to OoC staff about their grant, including quarterly reports. Grant recipients submit their quarterly reports to OoC with a password-protected Microsoft Excel document. Grant recipient data is only accessible by OoC. Grant recipients are not able to view or access other grantee data.

Grant recipients may also use the community feature to pose questions to the group. For example, a grant recipient may ask for recommendations from the group on teaching techniques that work well with elderly English language learners. Another grant recipient with a large number of elderly clients may reply with information on their preferred approach. Subject Matter Experts from OoC may also weigh in on the question. OoC staff may also post questions for group discussion on the website. For instance, in lieu of a webinar, they may host monthly themes for discussion on the collaboration tool.

Accessing the Collaboration Tool

Grant recipients are emailed a link to the system after OoC staff set up a profile for each recipient. To create a recipient profile in the collaboration tool, OoC creates an account for each grant point of contact. The account contains the following information: organization name, description of organization, main phone number, and address (optional entry); the contact contains the following information: employee title, name, organization name, work phone number, work email, and work address (optional entry). The account also maintains the following grant information: grant name, grant number, grant award year, and account name.

After OoC creates a profile for each recipient, the associated contact(s) receive a "Welcome" email from the collaboration tool with a username and hyperlink to the login page. Grant Recipients are required to use two factor authentication to gain access to the system. The associated contact(s) is prompted to enter his or her mobile (work or personal) phone number or email address on the login page; the system then sends a verification code to the contact(s) via text message or email. Upon receipt, the contact enters the verification code into the login page. The system then prompts the contact to create a password with at least eight characters, one letter, and one number. Contacts do not have to perform two factor authentications for future log-ins after they have created a password for the system.

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?

Section 538 of the Department of Homeland Security Appropriations Act, 2016 (Pub. L. No. 114-113), Division F, Title V authorizes USCIS to collect information.

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

The following Privacy Act System of Records Notices apply to the collection, use, maintenance, and dissemination of information:

- DHS/USCIS-007 Benefits Information System,[2] covers the collection and use of class participant information to assess the effectiveness of the grant program.

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[2] DHS/USCIS-007 Benefits Information System, 81 FR 72069 (October 19, 2016).

- DHS/ALL-004 General Information Technology Access Account Records System,[3] covers the collection and use of information to provide USCIS employee's access to the OoC Grant Collaboration Tool.

- DHS/ALL-037 E-Authentication Records System of Records,[4] covers the collection and use of information to authenticate an individual's identity for the purpose of obtaining a credential to electronically access the OoC Grant Collaboration Tool.

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

Yes. The OoC Grant Collaboration tool is covered as a minor application under the Salesforce Tracking Activities and Relationships System (STARS). USCIS completed the Salesforce Hosting Environment security assessment and authorization documentation on December 23, 2016, and was issued a three year Authority to Operate on June 30, 2016.

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

Yes. GRS 1.2, Items 010, 020, 021. Unaccepted applications (rejected or withdrawn) are saved on the OoC's internal shared drive and destroyed when three years old. Accepted applications are also saved to the shared drive and destroyed 10 years after the last action is taken on the file. The grant program launched in 2009, and the 15 year requirement to destroy is not applicable at this time.

Correspondence between individuals or a limited number of participants and quarterly reporting data will be deleted from the collaboration tool within six months of the end of the performance period for the grant. Group discussions of grant-related work and promising practices will be housed indefinitely in the system, provided that the discussion remains relevant, but not longer than 15 years.

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.

Form G-1482, *Citizenship and Integration Grant Program, Notice of Funding Opportunity* is subject to the PRA and is undergoing the OMB approval process. The following forms are subject to the PRA and obtained OMB approval: Form SF-424, *Application for Federal Assistance*

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[3] DHS/ALL-004 General Information Technology Access Account Records System, 77 FR 70792 (November 27, 2012).
[4] DHS/ALL-037 E-Authentication Records System of Records, 79 FR 46857 (August 11, 2014).

(OMB No.4040-0004) and Form SF-424A, *Budget Information for Non-Construction Programs* (OMB 4040-0006).

Section 2.0 Characterization of the Information

The following questions are intended to define the scope of the information requested and/or collected, as well as reasons for its collection.

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

As part of the USCIS Citizenship and Grant Integration Program, USCIS OoC collects the following information:

Application Package

OoC posts the Form G-1482, *Citizenship and Integration Grant Program, Notice of Funding Opportunity*, to grants.gov. Applicants are required to provide the names and resumes of key personnel in their application package. The notice of funding opportunity instructs applicants to provide a number of documents (*i.e.*, project narrative, budget table and narrative, resumes of key personnel) to be reviewed and scored according to the published evaluation criteria. Resumes are required in order to assess organization capacity to provide citizenship instruction and naturalization application services.

Grant Collaboration Tool

Profiles contain the following information about each user: organization name, description of organization, organization's main phone number, and organization's address (optional entry), employee names, employee work phone number, employee work email, grant name, grant number, and grant award year.

Quarterly Report

Grant recipients will report A-Numbers and countries of birth for each individual who receives citizenship instruction and/or naturalization application services under the grant program. Additional data elements include: organization name, date enrolled, class number, class level, pre/post-test used, test scores, date screened, whether the individual self-filed the naturalization application, date the naturalization application was filed by grantee, date G-28 *Notice of Entry of Appearance as Attorney or Accredited Representative* was filed, fee waiver filed by, date Request for Evidence (RFE) responded by, date passed/failed test, and date oath taken.

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

USCIS collects information directly from the grant applicant and recipient. The grant recipient is responsible for enrolling and collecting information from individuals who receive instruction from its program. The grant recipient shares limited sensitive biographic information about its students with USCIS to be used for the internal evaluation of the grant program.

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

No.

2.4 Discuss how accuracy of the data is ensured.

USCIS OoC collects application and supplemental evidence directly from the public or private nonprofit organizations seeking a grant under the Citizenship and Integration Grant Program. Grant recipients are provided access to the collaboration tool for collaboration purposes. USCIS depends upon the accuracy of the information provided by the grant applicant and recipient.

2.5 Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: There is a risk of over collection of information for making a grant determination.

Mitigation: During the information collection review process, the USCIS Privacy Office reviews forms during the development and revision process to ensure that only the minimum amount of information is collected to determine grant eligibility. USCIS requires the information collected to establish and determine grant eligibility of the applicant. All data elements collected are negotiated with and approved by the Office of Management and Budget (OMB) during PRA collection review. Furthermore, if grant applicants report more information than necessary, OoC will destroy sensitive material before saving the applications on the OoC's internal shared drive. Unaccepted applications (rejected or withdrawn) are saved on the OoC's internal shared drive and destroyed when three years old. Accepted applications are also saved to the shared drive and destroyed ten years after the last action is taken on the file.

Section 3.0 Uses of the Information

The following questions require a clear description of the project's use of information.

3.1 Describe how and why the project uses the information.

Application Package

Organizations seeking grant funds for citizenship and naturalization application services submit an application to USCIS for consideration. The application and supplemental evidence is required in order for OoC to effectively assess an organization's capacity to provide citizenship instruction and naturalization application services. USCIS uses the provided information to determine which organizations are to be awarded the USCIS Citizenship and Integration Grant Program.

Grant Collaboration Tool

USCIS uses the OoC Grant Collaboration Tool to communicate with grant recipients. This system is used in lieu of email to communicate with grant recipients and allows for the secure exchange of messages and attachments (*e.g.*, instructions, quarterly reports, presentation slides). This tool expands opportunities for collaboration and sharing of promising practices among grant recipients.

Quarterly Report

Using Computer Linked Application Information Management System (CLAIMS) 3,[5] CLAIMS 4,[6] and USCIS Electronic Immigration System (USCIS ELIS)[7] databases, the A-numbers collected are used to ascertain general statistics about the individuals who are served by the grant program, including date of birth, date lawfully admitted for permanent residence, locality, age, and other factors to be used for the internal evaluation of the grant program. The country of birth of each individual is used as an easy variable to check the integrity of the data provided by the grantee against USCIS' data systems.

3.2 Does the project use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly? If so, state how DHS plans to use such results.

No.

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[5] *See* DHS/USCIS/PIA-016(a) Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems, *available at* www.dhs.gov/privacy.

[6] *See* DHS/USCIS/PIA-015 Computer Linked Application Information Management System (CLAIMS 4), *available at* www.dhs.gov/privacy.

[7] *See* DHS-USCIS/PIA-056 USCIS ELIS, *available at* www.dhs.gov/privacy.

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

Yes. DHS Office of Procurement Operations (OPO), Grants and Financial Assistance Division conducts an initial review of the applications received in response to the Notice of Funding Opportunity. This review is conducted in accordance with a Memorandum of Agreement (MOA) between the DHS OPO and USCIS. The MOA, which requires OPO to perform initial reviews of applications for completeness, responsiveness, and eligibility (among other tasks), is authorized pursuant to the Economy Act, 31 U.S.C. § 1535 as implemented by the Federal Acquisition Regulation (FAR) Subpart 17.5. DHS OPO does not have access to the Grant Collaboration Tool, including the monthly reports.

Additionally, USCIS may also share grant information when there are allegations about improper use of grant funds with the Inspector General. USCIS will not provide the Inspector general with direct access to the Grant Collaboration Tool, including the monthly reports.

3.4 <u>Privacy Impact Analysis</u>: Related to the Uses of Information

<u>Privacy Risk:</u> There is a risk that that information may be used outside of the original purpose for collection, which is to determine grant eligibility, review grant effectiveness, and provide a space for grant recipients to collaborate.

<u>Mitigation:</u> All records are protected from unauthorized access and use through appropriate administrative, physical, and technical safeguards that include restricting access to authorized personnel who have a need-to-know. All grant applications undergo a technical review process by USCIS personnel. During this process, USCIS personnel review the application package against published evaluation criteria to score the grant proposal. USCIS limits access to PII by employing role-based access. All USCIS employees are thoroughly trained regarding the use and sensitivity of the information. The technical review process requires confidentiality throughout all proceedings, including the evaluation of proposals. Disclosure of sensitive proposal selection information or reviewer names and affirmations can be damaging both to DHS and to the applicants who have entrusted DHS with their proprietary information or intellectual property.

Additionally, all grant reviewers who are USCIS employees must sign a USCIS *Conflict of Interest*, *Confidentiality and Non-Disclosure Form* before the start of the grant review. If at any time during the evaluation process an unauthorized disclosure or release of privileged information occurs, a full investigation will be conducted by the appropriate security authorities for appropriate corrective measures, including but not limited to disciplinary action. USCIS technical reviewers must destroy all working papers, rough drafts, computation sheets, computer disks, copies or notes relating to the evaluation process not required for retention in the official proposal selection.

Section 4.0 Notice

The following questions seek information about the project's notice to the individual about the information collected, the right to consent to uses of said information, and the right to decline to provide information.

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

USCIS provides general notice to individuals through the publication of this PIA and associated system of record notice (SORN). Additionally, USCIS provides a Privacy Act Statement prior to the submission of any information, as required by Section (e)(3) of the Privacy Act. The Privacy Act Statement notifies the individual about the authority to collect the information requested, purposes, routine uses, and consequences of providing or declining to provide the information to USCIS. The Privacy Act Statement is included on the collaboration tool login page and grants.gov, the channel for grant applications.

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

The Privacy Act Statement informs individuals that providing information is voluntary. A customer can choose to decline to provide information; however, that may prevent the customer from participating in the USCIS Office of Citizenship Grant Program.

4.3 <u>Privacy Impact Analysis</u>: Related to Notice

There is no privacy risk related to notice. All information collected by USCIS Office of Citizenship Grant Program is provided directly from the customer or representative filing for a benefit request.

Section 5.0 Data Retention by the project

The following questions are intended to outline how long the project retains the information after the initial collection.

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

Through General Record Schedule (GRS) 1.2, Items 010, 020, 021, unaccepted applications (rejected or withdrawn) are saved on the Division's internal shared drive and destroyed when three years old. Accepted applications are also saved to the shared drive and destroyed 10 years after the last action is taken on the file. The grant program launched in 2009, and the 15 year requirement to destroy is not applicable at this time.

Correspondence between individuals or a limited number of participants and quarterly reporting data will be deleted from the system within six months of the end of the performance period for the grant. Group discussions of grant-related work and promising practices will be housed indefinitely in the system, provided that the discussion remains relevant, but not longer than 15 years.

5.2   Privacy Impact Analysis: Related to Retention

There is no risk related to retention. Records associated with the USCIS Citizenship and Integration Grant Program are covered under the General Records Schedule.

Section 6.0 Information Sharing

The following questions are intended to describe the scope of the project information sharing external to the Department. External sharing encompasses sharing with other federal, state and local government, and private sector entities.

6.1   Is information shared outside of DHS as part of the normal agency operations? If so, identify the organization(s) and how the information is accessed and how it is to be used.

Yes. USCIS notifies relevant members of Congress when organizations within their jurisdiction has been awarded grant funding.[8] After Congress has been notified, DHS emails the grant award document to grant recipients and notifies the public through a news release. USCIS publicly releases limited information about organizations that are awarded a grant under the USCIS Citizenship and Integration Grant Program and the amount of the award. The list of grant recipients is available on the USCIS website[9] as well as through "Find a Class" on www.myuscis.gov.

USCIS may also share grant information outside of DHS when there are allegations about improper use of grant funds. Examples include: suspected embezzlement, unauthorized practice of immigration law, and theft of grant funds. When appropriate, USCIS OoC may share grant recipient information listed in Section 2.1 of this PIA with and federal, state, and local law enforcement agencies.

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

The Privacy Act of 1974 requires executive agencies to publish a SORN whenever a group of any records under the control of an agency from which information is retrieved by the name of

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[8]*See* Sec. 507 of Div. F of Pub. L. 114-113
[9] https://www.uscis.gov/citizenship/learners/find-help-your-community.

the individual or by some identifying number, symbol or other identifying particular assigned to the individual. One aspect of the SORN is to identify how the information is shared by the agency (via routine uses section) to external agencies. The SORNs identified in Section 1.2 cover USCIS' collection, use, maintenance, and sharing of individual information for authentication purposes while creating system accounts and evaluating the program effectiveness. USCIS does not share information about individuals with external agencies.

USCIS is sharing information about the grant recipients (*i.e.*, community based organizations and educational institutions) awarded funding under the USCIS OoC Citizenship and Integration Grant Program. Grant recipients are organizations, not individuals. Therefore, the SORN requirement, including routine uses, are not applicable since USCIS is not sharing information about individuals who received civic instruction or naturalization services from grant recipients with external agencies.

6.3   Does the project place limitations on re-dissemination?

OoC does not routinely share information about the grant application and collaboration tool with any agency outside of DHS. USCIS only shares information with authorized entities when there are allegations of improper use of grant funds.

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

USCIS maintains records of disclosure of information in accordance with the routine use set forth in the applicable SORN.

6.5   Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk of unauthorized disclosure of grant recipient information.

Mitigation: USCIS receives the information through the grant application process and stores it in a secure facility. As part of the USCIS Citizenship and Integration Grant Program, USCIS publicly releases the organizational name of grant recipients through its website and through a searchable tool called 'Find a Class.' OoC does not routinely share information about the grant application and collaboration tool with any agency outside of DHS. USCIS will only share information with authorized entities for an authorized need.

Section 7.0 Redress

The following questions seek information about processes in place for individuals to seek redress which may include access to records about themselves, ensuring the accuracy of the information collected about them, and/or filing complaints.

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

USCIS creates grant recipients online accounts and are required to authenticate their identity via a secure login using the username, password, and authentication code. Once authenticated, individuals may access the information they used to create their profiles, such as name and address information, as well as their password reset and security questions and answers on file.

Additionally, an individual seeking access to his or her information may gain access to his or her USCIS records by filing a Freedom of Information Act (FOIA) or Privacy Act (PA) request and submitting the requests to following address: USCIS National Records Center. Freedom of Information Act/Privacy Act Program, P. O. Box 648010, Lee's Summit, MO 64064-8010. Further information for Privacy Act and FOIA requests for USCIS records can also be found at http://www.uscis.gov.

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

The collaboration tool allows the grant recipients to directly engage with USCIS and have access to correct information posted in the tool. Additionally, individuals may direct all requests to contest or amend information to the FOIA/Privacy Act Office at the USCIS address above. 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."

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

USCIS grant application instructions, the USCIS website, this PIA, and the associated SORNs notify individuals of the procedures for correcting information.

7.4 Privacy Impact Analysis: Related to Redress

There is no privacy risk related to redress with respect to Citizenship and Integration Grant Program and tool. Individuals may access the information they submit to the collaboration tool at any time. Additionally, individuals may request access to information about themselves under the FOIA and Privacy Act.

Section 8.0 Auditing and Accountability

The following questions are intended to describe technical and policy based safeguards and security measures.

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

USCIS ensures that the practices stated in this PIA are followed by leveraging training, policies, rules of behavior, and auditing and accountability.

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

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

8.3 What procedures are in place to determine which users may access the information and how does the project determine who has access?

External Users

Employees of grant recipient and employees of sub-awardees of grant recipients that conduct grant-related work are granted access to the Grant Collaboration Tool. Grant recipients are separately emailed a link to the system after OoC staff set up a profile for each recipient. To create a recipient profile in the collaboration tool, OoC creates an account, contact and grant; the account contains the following information: organization name, description of organization, main phone number, and address (optional entry); the contact contains the following information: employee title, name, organization name, work phone number, work email, and work address (optional entry); the grant contains the following information: grant name, grant number, grant award year, and account name.

DHS Users

OoC employees who administer the grant and OoC subject matter experts from the Division of Citizenship Education and Training have access to the Grant Collaboration Tool. To gain access to the system for new OoC staff, existing OoC send a service item (request) via the collaboration tool to the OIT Salesforce Support Team (STARS). Once access is granted, employees are emailed a username and link to the collaboration tool single-sign on login page.

8.4   How does the project review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within DHS and outside?

USCIS has a formal review and approval process in place for new sharing agreements. Any new sharing agreements, use of information, and/or new access requests for USCIS systems must go through the USCIS change control process and must be approved by the proper authorities prior to sharing information within and outside of DHS.

Responsible Officials

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U.S. Citizenship and Immigration Services
Department of Homeland Security

Approval Signature

Original, signed copy on file with the DHS Privacy Office.

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Department of Homeland Security.