



Privacy Impact Assessment
for the

myUSCIS Account Experience

DHS/USCIS/PIA-071

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Abstract

U.S. Citizenship and Immigration Services (USCIS) operates myUSCIS Account Experience to engage benefit requestors and legal representatives, while they navigate and complete the immigration process, through an authenticated digital account experience. MyUSCIS Account Experience offers a personalized, authenticated, and secured account for benefit requestors and legal representatives, and replaces all aspects of the public facing USCIS Electronic Immigration System (USCIS ELIS).¹ This Privacy Impact Assessment (PIA) evaluates the privacy risks and mitigations associated with the collection, use, and maintenance of personally identifiable information (PII). USCIS plans to update the appendices of the PIA as subsequent services and functionalities are added to myUSCIS Account Experience.

Overview

U.S. Citizenship and Immigration Services (USCIS) is the component of the Department of Homeland Security (DHS) that oversees lawful immigration to the United States. This mission includes receiving and adjudicating a wide variety of immigration and non-immigration benefits and requests (hereafter referred to as *immigration benefits*). USCIS historically operated under a paper form intake process requiring USCIS adjudicators to use a variety of case management systems to adjudicate the benefit request and issue written notices. During this time, USCIS only offered live assistance for individuals seeking case assistance or updates through the National Customer Service Center (NCSC) and field office visits.² Further, benefit requestors experienced an unauthenticated and fragmented online experience, or extended wait-times from NCSC and the local field office, and could only access limited information about pending benefit filings.

As part of its mission, USCIS is striving to expand opportunities for individuals to further engage with USCIS. USCIS is endeavoring to provide individuals reliable and up-to-date access to general and pending case information. USCIS established the myUSCIS Account Experience to offer customers an authenticated and holistic online experience. The purpose of myUSCIS Account Experience is to integrate personalized digital services for a seamless end-to-end online experience through a secure USCIS online account. Through myUSCIS Account Experience, individuals are able to create a personal account to securely use digital services that supports the benefit request process and allows access to pending case information. MyUSCIS Account Experience will replace all aspects of the public-facing USCIS Electronic Immigration System

¹ See DHS/USCIS/PIA-056 USCIS Electronic Immigration System (USCIS ELIS), available at www.dhs.gov/privacy.

² See DHS/USCIS/PIA-054 National Customer Service Center, available at www.dhs.gov/privacy.



(USCIS ELIS).³ USCIS ELIS continues to serve as an internal electronic case management system that allows USCIS adjudicators to process certain benefit request forms.

myUSCIS Account Experience offers the following six core digital modules along with several supporting functions and capabilities:

1. **Onboarding** allows account holders to establish a secure account with USCIS.
2. **Account Home** serves as the central location for account holders to manage their case with USCIS.
3. **Digital Forms** allows individuals to electronically file applications and petitions.
4. **Case Activity** offers a holistic view of a single case as well as a view into a customer's full immigration history with USCIS.
5. **Document Center** serves as a repository of documents and notices specific to the account holder that are integral to the immigration process.
6. **Secure Messaging** provides access to live assistance within the account.

This secure online account allows individuals to manage their account, profile, and case information with USCIS. Together, these modules provide individuals with a cohesive experience.

myUSCIS Account Experience is an expanding initiative with several supporting services to contribute to the overall immigration experience of individuals. As myUSCIS Account Experience includes additional support services, USCIS plans to update the Appendix to this PIA to evaluate risks and mitigation strategies of each support service.

This PIA examines each module further to discuss the personally identifiable information (PII) USCIS collects, uses, and maintains while using myUSCIS Account Experience.

Account Creation

myUSCIS Account Experience allows benefit requestors and legal representatives to create a USCIS online account through <https://myaccount.uscis.dhs.gov/>. To create an account, an individual enters an email address into an online form. USCIS sends a confirmation email to the provided address for accuracy. The email address is then stored as the account holder's username. The account holder creates a strong password, and provides answers to security questions that he or she will be asked to reset the account password in the future. The security questions are "fill-in-the-blank" questions the customer provides the answer during account set-up. USCIS provides the customer with a dropdown menu of standard questions, and the customer chooses which ones to use as his or her security questions. USCIS will not use the answers to these questions for

³ See DHS/USCIS/PIA-056 USCIS Electronic Immigration System (USCIS ELIS), available at www.dhs.gov/privacy.



purposes other than assisting with password resets (e.g., the answers would not be available to adjudicators for an immigration benefit purpose or fraud investigators in the event of a fraud investigation).

myUSCIS Account Experience passwords and answers to the security questions are centrally stored within the USCIS Identity, Credential and Access Management (ICAM) system. Passwords are not visible. The answers to the security questions are only visible to USCIS customer helpdesk personnel who assist account holders in resetting their passwords. USCIS ICAM provides myUSCIS with account credentialing, account authentication, and identity verification for account holders. ICAM collects this initial information. The USCIS online account includes account information, profile information, and availability for online filing.

Two Factor Authentication

To complete the onboarding process, USCIS sets a two-factor authentication code preference for integrity and authenticity assurance purposes. Each time the individual logs-in, myUSCIS forwards an authentication code through an email or SMS, or through the use of a third-party authenticator application as part of his or her logon credentials. If the account holder chooses to use a third party authentication application, he or she is provided instructions on how to connect to the authentication application. The selection and use of a third-party application is at the discretion of the account holder. The account holder can use any authentication application available on the smart device of his or her choice. USCIS does not prescribe a specific authenticator application. A separate USCIS notice informs the account holder to familiarize him or herself with the privacy policy of the third party application since USCIS has no control over the third party policies. The user credentials are sent to the USCIS ICAM system for verification and authentication.

Identity Proofing

USCIS provides remote identity proofing using Identity Proofing as a Service (IDPaaS). IDPaaS is a challenge-response system utilizing shared knowledge likely to be known to USCIS and the myUSCIS account holder but unlikely to be known to third parties. This challenge-response system draws questions based on information contained within the Central Index System (CIS),⁴ originally derived from other USCIS systems, DHS systems, including U.S. Customs and Border Protection (CBP), and Department of State (DOS) systems.

Potential questions may ask on what street an applicant lived or what DOS post his or her immigrant visa was granted. This is similar to how some commercial applications in the United States verify the identity of application account holders. Account holders who are required to use IDPaaS are provided a notice explaining what identity proofing is and what to expect before

⁴ See DHS/USCIS/PIA-009 Central Index System, available at www.dhs.gov/privacy, to learn more about CIS and view system USCIS, DHS, and DOS interfaces used develop challenge questions in support of identity proofing.



launching into the process. If account holders are unable to pass the IDPaaS questionnaire, they are presented with instructions on how to proceed on an alternate identity proofing path, which may be contacting NCSC or appearing in-person at a USCIS field office. Once the account holder passes the identity proofing quiz, myUSCIS Account Experience retains the fact that the account holder has been identity-proofed and does not require the account holder to repeat the process for subsequent immigration benefit requests.

The questions presented to each account holder are dynamically generated based on the best information USCIS has about the account holder in CIS and the most diverse set of questions available. This data originally comes from information the DOS collected in-person when issuing a visa, information CBP collected in-person upon entry at the border, and information USCIS has collected from the account holder based on previous immigration benefit requests. In designing the questionnaire, USCIS looks at the breadth of data and categorizes it into several domains based upon the type of information, such as travel, contact information, etc. The questionnaire is designed to ask the account holder questions from different domains to ensure the account holder is showing knowledge of a wide breadth of data about him or herself and also data that would not be known by a different person. IDPaaS may allow account holders more than one attempt to pass the questionnaire, but only if the system has enough reliable data in enough domains about the account holder. Questions are in multiple-choice format and include a “none of the above” option, when appropriate.

Account Home

The myUSCIS Account Experience homepage serves as the central location for account holders. Account holders are able to save information throughout the benefit filing process and return at a later time to submit or delete their draft case. Account holders who successfully submit their case are able to manage their active cases from the beginning until the end. From the dashboard, account holders are able to:

- Select notifications options. As part of the account experience, the account holder can receive notifications when there is a change in status. These alerts are sent via email or text depending on the preference set by the account holder at the time of account creation. These text or email alerts only provide notice that there has been a change to the case. The account holder has the option to log in to the myUSCIS online account for additional information;
- Manage draft e-file forms;
- Access documents and notices;
- Start and send a secured message to USCIS;
- Request an update to his or her profile;



- View current status of any case and immediate next steps; and
- View estimated processing time for a benefit request and next milestone in case lifecycle.

Digital Forms

USCIS allows certain benefit request forms and service types to be completed and filed by benefit requestors and/or legal representatives through their myUSCIS account.

The Digital Form module is an interactive tool that assists individuals with completing immigration benefit request forms or service types. The digital benefit request forms collect the same information as the corresponding paper form. Prior to initiating the request, USCIS provides the account holder with a Privacy Notice covering the particular benefit request at the time of that collection. The immigration benefit request forms and service types are dynamic meaning that questions dynamically expand or become disabled as the account holder progresses through the request. In other words, an account holder's answer to one question may prevent a series of additional questions from being necessary. This enables the customer to respond only to applicable questions. The account holder may edit, delete, or update information when the form is in draft state. The system does not keep copies of these previous iterations. Prior to the submission of the benefit request form, the account holder has the opportunity to review the information entered as part of benefit request form or service type. A draft case is deleted if inactive for 30 days.

Account holders who are assisted by a legal representative on a specific immigration case must complete Form G-28, *Notice of Entry of Appearance as Attorney or Accredited Representative*, and file it with USCIS. This can be accomplished online via myUSCIS Account Experience or on paper via the USCIS Lockbox service.⁵ If a paper filing for an immigration benefit type is submitted with a Form G-28, the Lockbox transmits the information to USCIS ELIS. myUSCIS Account Experience interfaces with USCIS ELIS and conducts a search to identify whether the legal representative already has a USCIS representative account in the system. If a legal representative account already exists, the new filing is linked to the existing account. If a legal representative account does not exist, the legal representative can create a USCIS online account through the myUSCIS Account Experience.

⁵ Lockbox facilities are operated by a specialized contractor authorized by the Department of Treasury (Treasury). This contractor manages the intake of USCIS benefit applications and the collection of associated fees submitted directly by mail. It provides the mechanisms to capture information electronically from USCIS benefit request forms, deposit associated fees, move the information to USCIS systems via a system interface, and generate acceptance and rejection notices to applicants. The contractor is also responsible for preparing the application-related files in accordance with USCIS guidance and sending the files to the next processing site (i.e., Service Center). The contractor does not approve or deny benefit request forms received by the USCIS Lockbox. See Department of Treasury Financial Management Service Privacy Impact Assessment, available at https://www.fms.treas.gov/pia/ECP_PIA.pdf.



Legal representatives may also electronically file requests in myUSCIS Account Experience. To successfully submit a filing in myUSCIS, both the legal representative and his or her client (i.e., the USCIS benefit requestor) must have their own, independent USCIS online account. The legal representative uses his or her account to draft a request on behalf of the benefit requestor. Upon completion, the legal representative submits it to the benefit requestor for review. When the legal representative submits the draft benefit request for benefit requestor review, the legal representative provides myUSCIS Account Experience with the benefit requestor's email address. MyUSCIS Account Experience then presents the legal representative with a passcode that should be provided to the benefit requestor. The benefit requestor must provide the passcode in order to access the draft request.

myUSCIS Account Experience then sends the benefit requestor an email informing him or her about the pending draft in their existing account. When the benefit requestor logs into the system he or she is prompted to input the passcode in order to view the draft immigration request completed by the legal representative. myUSCIS Account Experience only gives the benefit requestor access to review the draft case if the email and passcode match. Upon review, the benefit requestor is able to reject the draft and send it back to the legal representative. The legal representative may then overwrite the previous draft and resubmit to the benefit requestor for review. However, a new passcode is required in order to access the revised document.

Once an account holder completes a benefit request and uploads necessary evidence, myUSCIS Account Experience requires the account holder to electronically sign the request and pay the applicable fee. Payment is made using the U.S. Department of Treasury's Pay.Gov service.⁶ USCIS does not collect the fee directly. Rather, the account holder is redirected to the Pay.Gov interface, and Pay.Gov collects payment information (e.g., credit card, debit card, or Automated Clearing House (ACH debit)) from a personal bank account and billing information. Once Pay.Gov validates the payment information, the account holder is routed back to myUSCIS Account Experience and the myUSCIS Account Experience confirms to the account holder that he or she successfully submitted the request.

Once the immigration request is submitted and accepted to USCIS, both the legal representative and the benefit requestor have access to the same processing requests and notices, as well as case status updates.⁷ If applicable, USCIS mails a receipt notice to the account holder's

⁶ See U.S. Department of Treasury Financial Management Services Pay.Gov Privacy Impact Assessment 2.0 (July 1, 2011), available at http://fms.treas.gov/pia/paygov_pia%20.pdf.

⁷At any point during the benefit adjudication process, account holders may change their legal representative or elect to forgo legal representation during the adjudication of a benefit request. Notification to USCIS of the substitution or withdrawal of a legal representative may occur in a written notice of withdrawal by the representative of record or upon the filing of a properly completed G-28 by the new representative, include the receipt number associated with the substitution. USCIS updates the appropriate systems to remove and add access for the legal representative. The updated legal representative is then provided case access and issued correspondence related to the benefit request.



physical address, as well as makes it available electronically through the myUSCIS Account Experience online account.

Case Activity

Case Activity provides current and past status updates and case processing times to account holders on pending immigration benefit requests filed through myUSCIS Account Experience. The case activity for electronically filed forms (for myUSCIS Account Experience only) is automatically updated based on the associated receipt number. The Case Activity modules notify the account holder of major milestones such as receipt of a benefit request form or upcoming biometric and interview appointments. The Case Activity module receives case status updates from Enterprise Citizenship and Immigrations Services Centralized Operational Repository (eCISCOR).⁸ Case updates associated with a receipt number are sent electronically on a daily basis to myUSCIS Account Experience. The Case Activity module provides the account holder with a detailed explanation of the case status. Account holders are able to use Case Status Online⁹ to obtain case updates for all forms filed outside of myUSCIS Account Experience.

Document Center

The Document Center serves as the document and notice repository for the account holder. In the Document Center, the account holder is able to upload and view evidence submitted in support of an electronically-filed or paper-filed application or petition, view notices issued by USCIS, and reuse evidence submitted previously for new forms or USCIS requests, in addition to searching, tagging, and sorting evidence and notices.

Case Evidence

USCIS requires initial evidence of proof of identification and justification of eligibility for a benefit or service by way of supporting documentation. Examples of supporting documentation include copies of birth, marriage, or adoption certificates; divorce decrees; affidavits of financial support; and/or school records. myUSCIS prompts the account holder to upload certain evidence based on the answers provided by the account holder while completing an application or petition. Account holders upload evidence by scanning documents and attaching the scanned images to a draft case or when responding to requests for additional information from USCIS.¹⁰ Account holders can also upload evidence during the application process as part of a request for evidence or as applicable.

⁸ See DHS/USCIS/PIA-023(a) Enterprise Citizenship and Immigrations Services Centralized Operational Repository (eCISCOR), available at www.dhs.gov/privacy.

⁹ See DHS/USCIS/PIA-019(b) Customer Relationship Interface System (CRIS), available at www.dhs.gov/privacy.

¹⁰ A request for evidence is made when an application/petition is lacking required documentation/evidence (initial evidence) or the USCIS adjudicator needs more documentation/evidence (additional evidence) to determine an applicant's eligibility for the benefit sought.



USCIS Correspondence

Notices are written communications indicating that USCIS has taken an action regarding a request that may or may not require action by the benefit requestor. In accordance with the Immigration and Naturalization Act (INA), USCIS has a statutory obligation to provide the benefit requestor with notice of action USCIS takes related to a request, as well as provide information related to the status of a request. A notice has a legal effect with respect to the adjudication of the requested benefit, and conveys information that the individual has a right to know and USCIS has a legal duty to communicate.

USCIS issues the following notices to communicate with customers or convey a status of an immigration benefit:

- Receipt of benefit requests forms and payments;
- Rejection of benefit requests forms;
- Transfer of files;
- Re-open cases; and
- Appointments (i.e., fingerprint, biometric capture, interview, rescheduled).

USCIS sends notices to inform benefit requestors of any actions that the requestors may need to take or actions that have been taken by USCIS.

USCIS adjudicators issue Requests of Evidence (RFE) or Notices of Intent to Deny (NOID) when an application lacks required documentation or the adjudicator needs additional evidence to determine an applicant's eligibility for the benefit sought. These forms are also uploaded into the Document Center. Once officially submitted, USCIS adjudicators review the benefit request and supporting documents to ensure all information is present. In situations in which evidence is missing or all required initial evidence is submitted but does not establish eligibility, USCIS may request that the benefit requestor to supply additional information through an RFE or NOID for continued processing.

USCIS adjudicators use the Enterprise Correspondence Handling Online (ECHO) and Notice Generation Systems to generate notices while processing benefit requests for immigration benefits.¹¹ USCIS uploads notices from these systems to the myUSCIS Account Experience. All notices available in myUSCIS Account Experience are also printed and mailed to the benefit requestors and their legal representatives.

¹¹ See DHS/USCIS/PIA-063 Benefit Decision and Output Processes, available at www.dhs.gov/privacy.



Secure Messaging

Secure messaging allows the account holder to send emails to USCIS while logged into his or her USCIS online account. To create a new email, the account holder clicks on the 'new message' button and a form is displayed. The authenticated form requests the subject, case receipt number, client name (legal representative only), and a text box to describe the issue.

The subject, case receipt number, and client name fields offer a drop down menu personalized for his or her account. When composing a secure message, the account holder is able to select one of the following options to autofill the subject line:

- A case already filed online;
- Filing an application online;
- Getting a confirmation or PIN via email;
- Getting an answer to a general question;
- Getting online filing to work in my browser;
- Making a payment; or
- Other (write subject in description).

The receipt number field is a drop down menu of active receipt numbers associated with that account holder's pending applications. This reduces the risk of an account holder providing an incorrect number in this field. If the account holder is a legal representative, he or she must select the name of the client from a drop down menu as well.

An open textbox is available to the account holder to provide additional feedback. Since emails are associated with a specific profile, USCIS notifies account holders to exclude personal information, specifically Alien Number or Social Security number, in the subject or message. Each inquiry is assigned a system-generated service item number and all corresponding messages are tied to the service item number. When all fields are completed, the account holder may send the email. The encrypted message is routed to NCSC after the account holder hits send. USCIS researches each inquiry to assist the account holder with resolving the issue. Based on the outcome of his or her finding, USCIS creates a response letter to inform the account holder of how his or her inquiry was resolved. The account holder receives a text or email alert when USCIS responds to an inquiry. USCIS only discloses information related to the case. If additional identity verification is required, USCIS may contact the account holder with information on record. All the responses between USCIS and the account holder are stored in the Secure Message module.



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?

The authority to collect information is found within the Immigration and Nationality Act (INA), 8 U.S.C. §§ 1103, 1201, and 1255.

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

The information collected, used, maintained, and stored in myUSCIS Account Experience is covered under the following SORNS:

- DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records¹² covers documentation and maintenance of an individual's immigration application, petitions, and requests as he or she passes through the U.S. immigration process;
- DHS/USCIS-007 Benefits Information System¹³ permits USCIS' collection, use, maintenance, dissemination, and storage of paper and electronic benefit request information. This includes case processing and decisional data not included in the A-File SORN. It also covers case specific information that is collected and shared with online account holders; and
- DHS/ALL-037 E-Authentication Records System of Records¹⁴ covers information collected to create and authenticate an individual's identity for the purpose of obtaining a credential to electronically access a DHS program or application.

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

Yes. myUSCIS was approved for operation on December 18, 2014, for a period of 36 months, unless a significant change to the information system required an earlier accreditation. The myUSCIS authority to operate (ATO) is set to expire on December 18, 2017. myUSCIS is undergoing the security authorization process and is to receive an update ATO upon completion of this PIA.

¹² DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 82 FR 43556 (Oct. 18, 2017).

¹³ DHS/USCIS-007 Benefits Information System, 81 FR 72069 (Oct. 19, 2016).

¹⁴ DHS/ALL-037 E-Authentication Records System of Records, 79 FR 46857 (Aug. 11, 2014).



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

No. USCIS is developing a retention schedule with NARA for myUSCIS that is subject to final approval. USCIS is proposing to maintain the masterfile data for 5 years and account registration data for 7.5 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.

The OMB Control number for online account creation is 1615-0122 (there is no corresponding agency number). Each benefit request form or service type filed through myUSCIS Account Experience has an existing OMB control number that covers the electronic information collection. An updated list is available in Appendix A and B.

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.

Account Creation

Benefit requestors and legal representatives are required to create separate accounts. To create an account, myUSCIS Account Experience collects name, physical address, home telephone number, mobile phone number, user name, user password, responses to security questions, and a USCIS-generated authentication code. For a legal representative profile, USCIS collects the organization name, bar number, licensing authority, accredited representation date, daytime phone number, fax number, mailing address, and an electronic signature to verify information.

Account Dashboard

The Account Dashboard serves as the central location for account holders to manage their case and relationship with USCIS. Account Dashboard serves as the access point of all the features of the online account.



Digital Forms and Services

The Digital Forms and Services module is an interactive tool that allows account holders to complete immigration benefit request forms or service requests electronically. The information collected from each benefit request form or service type varies and not all forms collect the same information. Generally, each form may collect the following information regarding benefit requestors and third party beneficiaries: full name, address, telephone number, date and place of birth, unique identifying numbers (i.e., Online Account Number, Alien Number, and SSN, citizenship/nationality, and gender. USCIS forms also collect information about the form preparer, interpreter, and legal representative. A full account of what data is requested for each immigration benefit and service type may be viewed by referencing the forms associated with each immigration benefit or service type in Appendix A and B.¹⁵

Case Activity

Case activity provides current and past status updates and case processing times to account holders on pending immigration benefit requests filed through myUSCIS Account Experience.¹⁶

Document Management

Document Management stores and maintains supplemental evidence uploaded from the account holder and notices uploaded from USCIS. Examples of supporting evidence include copies of civil documents such as birth, marriage, or adoption certificates; divorce decrees; affidavits of financial support; or school records. Examples of USCIS notices include receipt of benefit requests forms and payments, biometric appointments, RFEs, and NOIDs.

Secure Message

Secure Message allows account holders to email USCIS about a specific case inquiry. Each email contains fields that request the subject of the inquiry, associated case receipt number, and a text box to describe the issue. Legal representative email contains the same fields and also requests the client name. The subject, case receipt number, and client name (only in the legal representative account) include a drop down feature.

- **Subject:** The account holder is offered multiple short, descriptive reasons for the inquiry (e.g., a case already filed online, filing an application online, other (write subject in description) to select and populate the subject heading.
- **Case Information:** The benefit requestor is provided a list of receipt numbers for cases that were filed online and selects the receipt number associated with the inquiry. The

¹⁵ All USCIS Forms are available at <https://www.uscis.gov/forms>.

¹⁶ USCIS processes all case submissions in the order they are received. Processing times are an estimate based on the time it is currently taking to process the benefit request type submitted and the number of pending applications or petitions of the same type in the office where the account holder's case is pending.



legal representative account is provided with a list of client names and receipt numbers for cases that were filed online or associated to the representative with a G-28 on file and is able to select the appropriate case information relating to the inquiry.

- **Text box:** An open textbox is available for the account holder to provide additional feedback. Since emails are associated with a specific profile, USCIS notifies account holders to exclude personal information, specifically Alien Number or Social Security number, in the subject or message.

Each inquiry is assigned a system-generated service item number and all corresponding messages are tied to the service item number.

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

Information in myUSCIS Account Experience is derived from account holders (i.e., benefit requestors and accredited representatives) for account creation, benefit form and service types, secure messages, and supplemental evidence. USCIS systems and personnel to provide data for case activity, processing times, USCIS notices, and secure messages.

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.

myUSCIS Account Experience collects user profile, biographic information, and supplemental evidence directly from the account holder (i.e., individual or his or her representative); therefore, USCIS is dependent upon the accuracy of the information provided by the account holder. To ensure the accuracy and integrity of the information, account holders are provided with the opportunity to review and edit information prior to its submission.

myUSCIS also receives information from USCIS systems or personnel to share information. The myUSCIS Account Experience account is tied to a unique identifier that links the authentication services with myUSCIS and the USCIS systems. To ensure data accuracy, myUSCIS validates data through system coding to mitigate or prevent inconsistencies in account holder data (e.g., the system rejects 00/00/00 birthdates) and that only the account holder information is being shared to create the personalized experience.



2.5 Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: There is a risk that myUSCIS Account Experience collects more information than necessary to adjudicate a benefit request.

Mitigation: myUSCIS mitigates this risk in two main ways. First, the system only collects information pertaining to one case at a time, so that the account holder cannot be prompted to enter information unless it pertains to the specific case on which the account holder is working. Second, the user interface dynamically skips questions that are not relevant based on previous responses. For example, when a paper form would instruct the customer to skip a section of the form based on his or her answer, myUSCIS skips to relevant sections and questions. It is possible for account holders to upload more evidence than necessary because they are allowed to submit “unsolicited evidence” at any point until adjudication. This is a valuable feature that allows benefit requestors the opportunity to provide information initially forgotten or submitted incorrectly, which partially mitigates the risk that benefit requestors may opt to provide too much information.

Privacy Risk: myUSCIS Account Experience may capture outdated, inaccurate, irrelevant or incomplete information through the Digital Forms module.

Mitigation: This risk is mitigated because the account holder has the ability to review information prior to submission to USCIS. USCIS account holders provide information to myUSCIS Account Experience directly to ensure accuracy of information. Prior to the submission of information by the Digital Forms module, myUSCIS Account Experience provides the individual with an opportunity to enter biographic information, review its accuracy, and amend it. Information submitted by the legal representative requires the benefit requestor to review the filing prior to electronically signing the form. The benefit requestor is required to check a box attesting that he or she has reviewed the information. This ensures the accuracy and integrity of the benefit request form prior to submission.

Privacy Risk: There is a risk that inaccurate or outdated evidence is stored and maintained in the Document Center.

Mitigation: USCIS mitigates this risk by requiring the account holder to provide valid documentation as initial evidence. USCIS requires supporting documentation as initial evidence of a benefit requestor’s identification and eligibility for a benefit. Current and accurate documents are required for USCIS to make a decision on a benefit request. USCIS relies on the account holder to verify the veracity of the evidence. Account holders are responsible for ensuring the most up-to-date documents are uploaded and included as part of their benefit request. If the account holder identifies that the incorrect document was uploaded, the account holder is able to delete the incorrect document and upload a new document. Also, prior to electronically submitting the benefit



request to USCIS, myUSCIS Account Experience allows the account holder to review the information, as well the supporting evidence.

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.

myUSCIS Account Experience allows account holders to engage with USCIS in an authenticated account experience. Specific uses of myUSCIS Account Experience and the information it contains include:

- Create a user profile;
- Draft, manage, and file benefit request forms and service types. Cases are maintained in myUSCIS Account Experience until it is submitted and signed electronically. Once the filing has been submitted, the information is sent to USCIS ELIS or the appropriate case management system for adjudication;
- Maintain supplemental evidence submitted with an e-filed application and reuse evidence submitted previously for new forms or USCIS requests;
- View notices issued by USCIS;
- View estimated processing times for cases and next milestones in case lifecycles;
- View current status of a case and immediate next steps;
- Access documents and notices related to a particular status; and
- Initiate secure messages to USCIS and manage responses from USCIS.

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.

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

No. Access to the data stored in myUSCIS Account Experience, as well as the system, is limited to account holders.



3.4 Privacy Impact Analysis: Related to the Uses of Information

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

Mitigation: USCIS mitigates the risk by minimizing the amount of information collected and by limiting the purposes for which USCIS may use the information. MyUSCIS Account Experience offers account holders with a secure online account to engage with USCIS. Access to the data stored in myUSCIS Account Experience, as well as the system, is limited to account holders. USCIS adjudicators do not have access the account holder information until it is officially submitted for USCIS review. USCIS systems administrator and help desk support have limited access to the account holder's account login information to assist with technical issues.

Privacy Risk: There is a risk that USCIS may access and use benefit information prior to the official submission of the benefit request.

Mitigation: USCIS mitigates this risk by restricting secure profile access to account holders (i.e., benefit requestors and legal representatives). While using myUSCIS Account Experience, account holders are able to save draft benefit request forms and upload supplemental evidence. The account holder may edit, delete, or update information when it is in draft state and the system does not keep copies of these previous iterations. This preserves the same confidentiality for an electronic filing as a paper filing. USCIS adjudicators do not have access to this information until the account holder submits the filing to USCIS, in which the information is routed to USCIS ELIS or other case management system. This risk is further mitigated by limiting the retention of draft forms in the system to 30 days from the date of last action on the form.

Privacy Risk: There is a risk that USCIS may access and use uploaded, not officially submitted, evidence maintained in the Document Center.

Mitigation: USCIS mitigates this risk by restricting access to information maintained in secure profile to the account holder only. USCIS adjudicators do not have access to documents stored in the Document Center or any other module of the secure profile. Account holders are limited to benefit requestors and legal representatives. The account holder must electronically submit the benefit request form and appended support evidence for USCIS to use the information for adjudication purposes. Once officially submitted, the benefit request is transferred to USCIS ELIS, or other case management system for review and adjudication. USCIS adjudicates the benefit request using only the information maintained in USCIS ELIS through normal processing procedures.

Privacy Risk: There is a risk that myUSCIS Account Experience will inadvertently disclose information about a different account holder.

Mitigation: USCIS mitigates this risk by implementing multiple security controls. First,



USCIS configured the interconnecting systems to link and share information associated with the same receipt number. Second, an account holder only has access to his or her own cases. This prevents information from being submitted for the incorrect individual. Lastly, legal representatives must select the receipt number and name of the client to upload the evidence. In addition, for final submission, the client (applicant) must validate the submission through his or her own account.

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 account holders through the publication of this PIA, associated SORNs, and through the USCIS website. Additionally, myUSCIS Account Experience provides a Privacy Notice prior to the submission of any information. The Privacy Notice notifies the account holder about the authority to collect the information requested, the purposes of collection, USCIS' routine uses of the information, and the consequences of an account holder providing or declining to provide the information to USCIS.

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

USCIS informs the account holder that providing information is voluntary. An account holder can choose to decline to provide information. However, this may prevent the account holder from using the myUSCIS Account Experience. By using myUSCIS Account Experience, the account holder is implying consent to USCIS' uses of information.

4.3 Privacy Impact Analysis: Related to Notice

There is no privacy risk related to notice. All information collected by myUSCIS is provided directly from the account holder. The account holder is provided a Privacy Notice prior to submitting any information to USCIS. Additionally, USCIS provides notice to individuals through this PIA, and associated SORNs.



Section 5.0 Data Retention by the project

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

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

USCIS is developing a retention schedule for myUSCIS Account Experience that is subject to final approval by NARA. USCIS is proposing to maintain the masterfile data for 5 years and account registration data for 7.5 years.

5.2 Privacy Impact Analysis: Related to Retention

Privacy Risk: myUSCIS does not have a records retention schedule.

Mitigation: This risk is partially mitigated. USCIS is developing a retention schedule for myUSCIS Account Experience and will not delete records until a retention schedule is approved by NARA. The proposed NARA schedule is consistent with the concept of retaining data only for as long as necessary to support USCIS mission. Until USCIS completes a NARA-approved retention schedule, USCIS plans to maintain all records indefinitely in accordance with the Federal Records Act, which prohibits agencies from destroying records without a NARA-approved 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.

USCIS does not share information maintained in myUSCIS Account Experience with external entities. While using myUSCIS Account Experience account holders may engage with third-party service providers, but USCIS does not share PII with third party service providers.

Third Party Authentication Service

myUSCIS Account Experience requires account holders to go through a two-step verification process. As part of two factor authentication, myUSCIS Account Experience account holders are able to use their email, SMS, or third party authentication service provider for the delivery of their two factor authentication code. The selection and use of a third-party authentication application is at the discretion of the account holder. USCIS has no control over the



application's privacy policies or what information the account holder provides.

myUSCIS Account Experience allows individuals to use a third-party authenticator application to provide two-factor authentication into their USCIS online account. ICAM generates a QR code and the account holder must either scan a QR code or enter a unique token manually generated by ICAM using a mobile device to pair the USCIS account with the specific authenticator application. The authenticator service provider then generates a temporary one-time password, which expires every 30 seconds. The temporary one-time password displayed on the account holder's mobile device must be entered into the ICAM system as a second level of authentication upon login. During this transaction, USCIS does not share any PII with the third party authentication service provider.

Pay.Gov

Account holders electronically filing a benefit request form or service must pay for the associated fees using the using the U.S. Department of Treasury's Pay.Gov service.¹⁷ The Pay.Gov icon is imbedded within the digital forms module. Once the account holder clicks the icon, the account holder is redirected to a Pay.Gov, which is a third-party website, to make the fee payment. MyUSCIS Account Experience provides a disclaimer notifying the account holder that he or she is being redirected to a non-USCIS site and is then no longer engaging with myUSCIS. Once an account holder links to Pay.Gov, the account holder is subject to the policies of the third-party site.

Pay.Gov allows account holders to make electronic payments to USCIS. Pay.Gov collects biographic and payment information—either credit card, debit card, or Automated Clearing House (ACH) debit from a personal bank account. Once Pay.Gov validates the payment information, account holders are routed back to myUSCIS Account Experience and the USCIS online account confirms to the account holder that he or she successfully submitted the request. During this transaction, myUSCIS Account Experience does not collect or share any information with Pay.Gov.

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

USCIS does not share information maintained in myUSCIS Account Experience with external entities.

6.3 Does the project place limitations on re-dissemination?

USCIS does not share information maintained in myUSCIS Account Experience with external entities.

¹⁷ See U.S. Department of Treasury *Financial Management Services Pay.Gov Privacy Impact Assessment 2.0* (July 1, 2011), available at, http://fms.treas.gov/pia/paygov_pia%20.pdf.



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

USCIS does not share information maintained in myUSCIS Account Experience with external entities.

6.5 Privacy Impact Analysis: Related to Information Sharing

There is no privacy impact related to external information sharing because information maintained in myUSCIS Account Experience is not shared with external entities.

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?

MyUSCIS Account Experience allows account holders to directly and securely engage with USCIS to obtain useful immigration on case-related information. Account holders who created online accounts must authenticate their identity 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 the case specific information prior to official submission to USCIS.

Additionally, an account holder seeking access to his or her information held by USCIS may gain access to his or her records by filing a Freedom of Information Act (FOIA) or Privacy Act request. Account holders not covered by the Privacy Act or Judicial Redress Act (JRA) still may obtain access to records consistent with FOIA unless disclosure is prohibited by law or if the agency reasonably foresees that disclosure would harm an interest protected by an exemption. Any account holder seeking access to his or her information should direct their request to the following address:

USCIS National Records Center (NRC)
FOIA/PA Office
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?

MyUSCIS Account Experience allows account holders to directly and securely engage with USCIS. Account holders are able to amend information in their accounts by logging in and making the correction to the information they provided prior to official submission to USCIS.

U.S. citizens and lawful permanent residents, as well as other persons with records covered by JRA, are afforded the ability to correct information by filing a Privacy Act Amendment request under the Privacy Act. U.S. citizens, lawful permanent residents, and persons covered by the JRA should submit requests to contest or amend information contained in USCIS systems. Individuals may direct all requests to contest or amend information 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 are not able to amend their records through FOIA. Should a non-U.S. person find inaccurate information in his or her record received through FOIA, he or she may visit a local USCIS Field Office to identify and amend inaccurate records with evidence.

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

Individuals are notified about procedures for correcting their information by myUSCIS Account Experience, published Privacy Notices in relevant USCIS application instructions, the USCIS website, this PIA, and relevant SORNs.

7.4 Privacy Impact Analysis: Related to Redress

There is no privacy risk with respect to redress. Account holders may access the information they enter into myUSCIS Account Experience prior to submission to USCIS. After information is officially submitted to USCIS, USCIS provides individuals with multiple avenues during and after the completion of the benefit request process to correct information. Individuals are also given numerous opportunities to correct information they have provided and to respond to information received from other sources.



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. 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 transactions of user in order to reduce the possibility of misuse and inappropriate dissemination of information. All user actions are tracked 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.

8.2 Describe what privacy training is provided to account holders 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 privacy awareness training addresses appropriate privacy concerns, including Privacy Act obligations (e.g., SORN and Privacy Notices). 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?

MyUSCIS Account Experience is a public-facing website and accessible to any individual or legal representative seeking immigration or case-related information. Account holders have access to their information only. Internal access to myUSCIS Account Experience is restricted by USCIS management and limited to authorized USCIS and contractor personnel.



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 information maintained in myUSCIS Account Experience with organizations within or outside of DHS. However, should this change, USCIS has a formal review and approval process in place that requires approval of any new sharing arrangement.

Responsible Officials

Donald K. Hawkins
Privacy Officer
U.S. Citizenship and Immigration Services
Department of Homeland Security

Approval Signature

Original, signed copy on file with DHS

Philip S. Kaplan
Chief Privacy Officer
Department of Homeland Security



Appendix A

Immigration Service Types Filed Online Through myUSCIS

Name of Immigration Service	OMB Control Number
USCIS Immigrant Visa Fee	1615-0122



Appendix B

Immigration Forms Filed Online Through myUSCIS¹⁸

Form Number	Form Name	OMB Control Number
<u>G-28</u>	Notice of Entry of Appearance as Attorney or Accredited Representative	1615-0105
<u>I-90</u>	Replacement of Permanent Resident Card	1615-0082
<u>N-400</u>	Application for Naturalization	1615-0052

¹⁸ All USCIS Forms are available at <https://www.uscis.gov/forms>.