

# US Department of Health and Human Services

## Privacy Impact Assessment

**Date Signed:**

06/03/2024

**OPDIV:**

ACF

**Name:**

Immigration Legal Services for Afghan Arrivals (ILSAA)

**PIA Unique Identifier:**

P-4507854-240655

**The subject of this PIA is which of the following?**

Major Application

**Identify the Enterprise Performance Lifecycle Phase of the system.**

Requirements Analysis

**Is this a FISMA-Reportable system?**

Yes

**Does the system include a Website or online application available to and for the use of the general public?**

Yes

**Identify the operator.**

Contractor

**Is this a new or existing system?**

New

**Does the system have Security Authorization (SA)?**

Yes

**Indicate the following reason(s) for updating this PIA.****Describe the purpose of the system.**

Congress authorized the Office of Refugee Resettlement (ORR) to provide immigration-related legal assistance to eligible Afghan populations through ORR grants such as Refugee Support Services (RSS), Preferred Communities, Cash and Medical Assistance (CMA), etc. to citizens or nationals of Afghanistan for whom such refugee and entrant assistance is authorized. The Immigration Legal Services for Afghan Arrivals (ILSAA) system supports states and other grantees' provision of legal services, technical assistance, and coordination support to eligible Afghan populations, and provides a legal service referral and coordination hub to states and ORR grantees serving eligible Afghan families and individuals.

**Describe the type of information the system will collect, maintain (store), or share.**

LSP case Management System in use and legal service providers (LSP) from emails and online form data entries. That information is passed to the Intake Team to conduct contact calls and collect additional information from potentially eligible Afghans and LSPs to create and populate records in the Clio service described below. The system also produces and shares training and webinar

materials via Zoom and an internal MS Teams collaboration hub.

The system initially collects information pertaining to potentially eligible Afghans Family:

Passport number  
Mailing Address  
Biometric identifiers  
Date of Birth  
Employment status  
Foreign Activities  
Military status  
Medical notes  
Phone Numbers  
Legal documents  
Email address  
Name  
Gender  
Interpreter required  
Preferred language  
Referral source  
Passport issuing country  
Received Notice to Appear  
Filed for immigration benefits in other countries  
Backup contact name  
Arrest(s) details  
Total number of children  
Family  
Interpreter required  
Preferred language  
Referral source  
Passport issuing country  
Received Notice to Appear  
Filed for immigration benefits in other countries  
Physical address  
Arrest(s) details  
Total number of children  
Family  
Date of entry US  
Gender  
Place of entry US  
Interpreter required  
I-94 status  
Preferred language  
Employment Authorization Document  
Referral source  
United States Citizenship Immigration Services Alien number  
Passport issuing country  
Previous US visits  
Received Notice to Appear  
Ever filed USCIS application  
Filed for immigration benefits in other countries  
Any current pending immigration applications in any country

Backup contact name  
Backup contact phone  
Physical address  
Marital status  
Arrest(s) details  
Number of children applying with  
Total number of children ]  
Legal Service Provider  
(LSP) Name

Legal Service Provider information collected:

LSP Title  
LSP Office Phone  
LSP state of admission  
LSP years of practice  
LSP years in immigration  
LSP previous pro bono/low bono  
LSP barred in state of residence  
LSP languages spoken  
LSP malpractice insurance  
LSP Title LSP Office address  
LSP Office Phone  
LSP work email  
LSP state of admission  
LSP year of admission  
LSP years of practice  
LSP Bar number  
LSP years in immigration  
LSP case types  
LSP previous pro bono/low bono  
LSP Affirmative asylum experience  
LSP barred in state of residence  
LSP American Immigration Lawyer's Association membership  
LSP languages spoken LSP Previous work with USCRI  
LSP malpractice insurance LSP case Management System in use  
LSP Title  
LSP Office Phone

**Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.**

"The system is less "system" in the conventional sense and more of a system of external services. It has a web front end set of web pages hosted by Federal Risk and Authorization Management Program (FedRAMP) Moderate WordPress and uses an online external service's customer relationship management software (Clio) that handles various business management tasks for lawyers including client intake, contact management, calendaring, document management,

timekeeping, billing, payment processing, trust accounting, track important deadlines, manage client cases and documents.

The system uses Qualtrics services to create and manage surveys, feedback, and polls, and the system uses Zoom's collaboration service for management and delivery of trainings, webinars and related media. The system also includes peer networking hub capabilities via an ( International Consulting Firm ) ICF-internal, (National Institute of Standards and Technology) NIST SP 800-171-compliant MS Teams implementation.

System user roles enable system personnel to search, filter and retrieve information on Afghan refugees, their cases and on legal service providers using functionality only accessible to authorized system users via the web application. The data quality team has access to the data for reporting purposes, the legal team has access so they can process cases, and the program management team access system development life cycle operations. No information is being shared outside users of the system.

**Does the system collect, maintain, use or share PII?**

Yes

**Indicate the type of PII that the system will collect or maintain.**

Other: Gender, Zip Code, Family Relationship, Tobacco Usage, State, and IP Address.

Has attorney Date of entry US Place of entry US I-94 status EAD USCIS Alien number Previous US visits Ever filed USCIS application Any current pending immigration applications in any country Backup contact phone Marital status Number of children applying with Legal Service Provider (LSP) Name LSP Office address LSP work email LSP year of admission LSP Bar number LSP case types LSP Affirmative asylum experience LSP American Immigration Lawyer's Association membership LSP Previous work with USCRI

**Indicate the categories of individuals about whom PII is collected, maintained or shared.**

**How many individuals' PII is in the system?**

10,000-49,999

**For what primary purpose is the PII used?**

To provide immigration legal services

**Describe the secondary uses for which the PII will be used.**

Program evaluation, data analysis

**Identify legal authorities governing information use and disclosure specific to the system and program.**

8 U.S.C. 1521–1524; Title V of the Refugee Education Assistance Act of 1980, 8 U.S.C. 1522 note.

**Are records on the system retrieved by one or more PII data elements?**

Yes

**Identify the number and title of the Privacy Act System of Records Notice (SORN) that is being use to cover the system or identify if a SORN is being developed.**

09–80–0325 Refugee Arrivals Data System (RADS)

**Identify the sources of PII in the system.**

**Identify the OMB information collection approval number and expiration date**

N/A

**Is the PII shared with other organizations?**

Yes

**Identify with whom the PII is shared or disclosed and for what purpose.**

**Describe any agreements in place that authorizes the information sharing or disclosure.**

Pursuant to the Privacy Act, all PII sharing involve routine uses and no agreements are required for these sharing/disclosures

**Describe the procedures for accounting for disclosures.**

ILSAA keeps an accurate accounting of the date, nature, and purpose of each disclosure of a record to any person or to another agency made including the name and address of the person or agency to whom the disclosure is made. ILSAA will retain the accounting made for at least five years or the life of the record, whichever is longer, after the disclosure for which the accounting is made.

**Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason.**

At the point of PII collection, individuals are presented with a Privacy Act Statement informing them:  
(A) the authority which authorizes the solicitation of the information and whether disclosure of such information is mandatory or voluntary;  
(B) the principal purpose or purposes for which the information is intended to be used;  
(C) the routine uses which may be made of the information and;  
(D) the effects on the individual, if any, of not providing all or any part of the requested information.

**Is the submission of PII by individuals voluntary or mandatory?**

Voluntary

**Describe the method for individuals to opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason.**

Individuals are free to opt-out of providing their information. However, opting-out will result in an inability to provide services to the individual. Immigration legal services cannot be provided without PII for the drafting and completion of immigration applications for legal relief.

**Process to notify and obtain consent from individuals whose PII is in the system when major changes occur to the system.**

In writing by regular United States Postal Service correspondence to their last known address within 10 business days.

**Describe the process in place to resolve an individual's concerns when they believe their PII has been inappropriately obtained, used, or disclosed, or that the PII is inaccurate.**

Clients can verify and confirm their information with the Intake team of ILSAA, which includes an interpreter, a translator, an attorney. PII subjects continuously collaborate with system users and if there is any PII identified that requires correction, the ILSAA user coordinates with legal service provider to correct the information

**Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy.**

Paralegals and providers will regularly review PII data with clients during the drafting and pre-submission process prior to filing applications with United States Citizenship and Immigration Services, Department of State, National Visa Center and State Family Courts.

**Identify who will have access to the PII in the system and the reason why they require access.**

**Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.**

Requests for inclusion in the roles identified above are sent to an email monitored by the ILSAA system Project Management team, who reviews and approves addition to role-based access control (RBAC) groups. Employees and direct contractors who will access PII will do so in order to provide legal services directly to the client, oversee the account management and administration of the system where PII is maintained and employees designated to troubleshoot issues with the system, should the system go down.

**Describe the methods in place to allow those with access to PII to only access the minimum amount of information necessary to perform their job.**

Clients will provide data that is relevant to applications for identified immigration legal relief. Staff will have role-based access limited for the purpose of filling out immigration applications.

**Identify training and awareness provided to personnel (system owners, managers, operators, contractors and/or program managers) using the system to make them aware of their responsibilities for protecting the information being collected and maintained.**

All direct contractors and government personnel using the system participate in HHS-provided cybersecurity awareness, privacy, records management, and insider threat awareness training.

**Describe training system users receive (above and beyond general security and privacy awareness training).**

All direct contractors and government personnel using the external services provided by 3rd parties receive a combination of user training provided by the vendors of the services used by ILSAA personnel - as well as on-the-job training (OJT) delivered in informal, collaborative knowledge-sharing sessions among system users aided by service-provided user manuals.

**Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?**

Yes

**Describe the process and guidelines in place with regard to the retention and destruction of PII.**

System administrators performing policy-required data custodial duties will follow National Archives and Records Administration (NARA) General Records Schedule 4.2: Information Access and Protection Records.

**Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.**

PII is stored and processed in the Clio service environment that has been assessed and certified by an independent American Institute of Certified Public Accountants (AICPA) assessor to meet or exceed the AICPA "points of focus" for each Trust Services Criteria in AICPA System and Organization Controls (SOC 2). The Clio service itself is resident in Amazon Web Services

East/West cloud that has been certified by the Federal Risk and Authorization Management Program (FedRAMP) Joint Authorization Board to meet the stringent Moderate Impact Level control requirements for federal government cloud service providers.

**Identify the publicly-available URL:**

<https://ilsaa.acf.hhs.gov>

Note: web address is a hyperlink.

**Does the website have a posted privacy notice?**

Yes

**Is the privacy policy available in a machine-readable format?**

Yes

**Does the website use web measurement and customization technology?**

Yes

**Select the type of website measurement and customization technologies is in use and if it is used to collect PII.**

**Does the website have any information or pages directed at children under the age of thirteen?**

No

**Does the website contain links to non- federal government websites external to HHS?**

Yes

**Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?**

Yes