



# Meeting Notes

March 22, 2010

## Collaboration Session #3 : External Data Interface Standards

### Background

USCIS hosted the third of a series of scheduled collaboration sessions on March 22, 2010 to further discuss the development of the External Data Interface Standards (EDIS). EDIS are the set of technical standards to allow a third party system to transfer immigration benefit request data directly to USCIS. This new system to system interface will be a new electronic filing (e-filing) channel and increase efficiency and improve the acceptance rate for immigration benefit requests. Posted below is a summary of this event and the questions and responses during that session

**Event:** EDIS Exchange #3 Collaboration Session  
**Date:** Monday, March 22, 2010  
**Participants:** 24 external parties participated

### **Agenda/Objectives:**

- To ensure the open ended questions from the previous sessions are addressed;
- To understand the concept of immigration accounts;
- To better understand the EDIS IEPD Exchange Model; and
- To gather input on the stakeholders' experience with electronic signatures and how it may be handled with this interface.

### **Questions and Answers**

Throughout the agenda, attendees participated in an open question and answer session with USCIS representatives. Below is a summary of the Q&A:

**Q: I understand one person equals one role, but we represent so many clients. Would an attorney be able to log in from their own account and access each one of his current clients?**

A: Remember one person could equal multiple roles, but the answer to your question is yes. The attorney could log into his attorney account and have access to case information for his/her clients. There must be an "electronic hand shake" between the attorney and the client which allows the attorney to represent the applicant and links the attorney and applicant accounts. This agreement would allow the attorney to view information specific to that case. The attorney would log into his/her online immigration account to access the information for his/her clients. This capability is enabled for benefit requests filed across all intake channels.

In addition, it is important that we all understand that each person will have one account, yet be able to serve in different roles. For example, an account holder may serve in the role of a representative when working with clients to file benefit requests on their behalf. The same account holder may then serve in the role of a benefit seeker if they are applying to adopt a child. In the transformed system, USCIS will

manage role assignments so that account holders are allowed to perform only authorized functions in the process. Account holders will need to specify the role in which they are acting when doing business with USCIS online as specific privileges will be granted, based on an individual's role.

**Q: Adobe signatures have not stood up in US courts. There have been 3<sup>rd</sup> party services, such as EchoSign, which have stood up in US courts. Will USCIS be developing an electronic signature system or will you all be looking for a third party service?**

A: We are considering all options at this point. USCIS is looking at having our own electronic signature system. Alternatively we are looking how we can authenticate a user in an attorney's system. USCIS will also be looking at what is being used by other government agencies and what methods have stood up in court. We want to provide options to our customers about how e-signatures can be supported.

Stakeholder Follow Up: I suggest really looking into a third party as an EchoSign since they have already done it and the requirements are there.

**Q: ICE accepts signature for I-9s. To sign, scan and transmit something is easy and not hard for customers. The signature pad is not a good idea as it is not a web-based platform and would require an applicant to be present.**

A: USCIS, at this point, will not be mandating one signature form; we would like to give options. So if we did accept a signature via a signature pad, we would also allow another option.

**Q: There are forms, for instance Department of State DS160 where the applicant needs to sign instead of the attorney. It would be undesirable for the attorney to have the applicant come into the office to sign before the application could be submitted. The attorney to get all the documentation submitted in conjunction with various signatures needed is going to be difficult. Does petitioner need to be the one to sign?**

A: USCIS is hoping to have all required signatures collected by the attorney, ideally within the attorney system. For example, the application would be completed; then the applicant would be notified and sign and remit payment with the attorney. All of this would take place prior to submission to USCIS, enabling attorneys to file a single and complete benefit request package.

Keep in mind, we are only collecting feedback at this point and USCIS is still looking at legal implications to all the scenarios around e-signature options.

**Q: The real question is does USCIS need the actual physical signature? Is an image necessary? USCIS will perform analytics on the signature for biometrics, right? Or can electronic click through for signature be enough? Once we know this, we can provide better feedback.**

A: We are hoping to get to a point where an actual image is not necessary. It helps also with customer service. But we are examining a number of options.

Stakeholder Follow Up: That would be preferable on our end.

**Q: We need to be clear as to what is a digital signature. Could it be a graphical image from an x.509 digital certificate? Many users employ this now so we really need to know what USCIS will require.**

A: USCIS is looking into all these suggestions. This conversation is very helpful.