



Privacy Impact Assessment Update
for the

USCIS Person Centric Query Service

Supporting

Immigration Status Verifiers of the USCIS National Security and Records
Verification Directorate/Verification Division

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Abstract

This is an update to the existing Privacy Impact Assessment (PIA) for the United States Citizenship and Immigration Services (USCIS), Verification Division, Immigration Status Verifiers' (ISV) use of the Person Centric Query Service (PCQS), operating through the USCIS Enterprise Service Bus (ESB) to: 1) expand the PCQS person-search capability, and 2) describe the privacy impact of updating the PCQS by adding access to five additional systems to the PCQS query; ENFORCE Integrated Database (EID), the Executive Office Immigration Review System (EOIR), the Refugees, Asylum, and Parole System (RAPS), the Treasury Enforcement Communications System (TECS) Arrival/Departure Data Query (TECS SQ94), and the TECS Subject Lookout Search (SQ11).

Overview

On January 18, 2008 Verification Division of the United States Citizenship and Immigration Services (USCIS) published on the DHS Privacy Office website www.dhs.gov/privacy a Privacy Impact Assessment (PIA) to address Immigration Status Verifiers' (ISV's) use of Person Centric Query Service (PCQS).¹ The January 18, 2008 PIA supplemented and added ISV specific information to the general PCQS service-level PIA that was published by USCIS on June 22, 2007.² The January 18, 2008 PIA generally described the primary data elements for each of the specific systems to which ISVs have access and use (data elements vary depending on the system.) It also explained the justification for accessing the various data sources as well as the privacy concerns and mitigations associated with the use of PCQS.

This is an update to the January 18, 2008 PIA for Verification Division, USCIS ISVs' use of the PCQS, operating through the USCIS Enterprise Service Bus (ESB) to 1) expand the PCQS person-search capability, and 2) describe the privacy impact of updating the PCQS by adding access to five additional systems to the PCQS query: ENFORCE Integrated Database (EID), the Refugees, Asylum, and Parole System (RAPS), the Executive Office Immigration Review System (EOIR), the Treasury Enforcement Communications System (TECS) Arrival/Departure Data Query (TECS SQ94), and the TECS Subject Lookout Search (SQ11).

Person Search

The ISVs access data in the various connected systems based on specific types of person centric queries. Originally, queries could be based on name and date of birth, A-number, or Receipt number. This new update expands the queries to allow person searches based on I-94 number, Student and Exchange Visitor Information System (SEVIS) Identification number, Visa Control number, and Social Security number. Social Security number (SSN) searches are mandated as part of the E-Verify and Systematic Alien Verification for Entitlements (SAVE) programs, the two programs supported by the Verification Division ISVs.³ The collection and use of SSNs is the normal and approved process for E-Verify

¹ *Privacy Impact Assessment Update for USCIS Person Centric Query Service Supporting Immigration Status Verifiers of the USCIS National Security and Records Verification Directorate/Verification Division*, January 18, 2008.

² *Privacy Impact Assessment for the United States Citizenship and Immigration Services Person Centric Query Service*, June 22, 2007.

³ Section 404(c) of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (IIRIRA), P.L. 104-



and SAVE as described in the Verification Information System (VIS) system of records notice (SORN) and privacy impact assessments (PIAs).⁴ Regardless of the type of query—name or number based—the response will return a limited set of comparable information as described in previous PCQS PIAs from each of the queried systems. The initial return will include: Name (First and Last), Aliases, Date of Birth, and Alien Number. If the initially returned information is not sufficiently informative, A Secondary, more detailed query is available and includes: Name (First, Middle, and Last), Aliases, Date of Birth, Alien Number, Country of Birth, Country of Citizenship, Immigration Status, Location, Arrival Information, Departure Information. The query returns are standard, although a given system may not have every data element, whether systematically or on a record by record case. Additional data fields will be available if the Status Verifier needs to access the system directly. If this returned information is sufficient for the ISV to verify the individual, no further access is needed. If the returned information is not sufficient to verify the individual, the ISV may access any additional information on the subject individual contained in each queried system. This layered access methodology provides the ISV with only the amount of information needed for the specific case, thereby building in the Fair Information Practice Principles of data minimization and use limitation.

Connected Systems

As noted in the January 18, 2008 PIA, PCQS provides access to the following systems:

1. Aliens Change of Address System (AR-11);
2. Central Index System (CIS);
3. Citizenship and Immigration Services Centralized Operational Repository (CISCOR);
4. Computer-Linked Application Immigration Management System 3.0 (CLAIMS 3);
5. Computer-Linked Application Immigration Management System 4.0 (CLAIMS 4);
6. Biometric Storage System (BSS);
7. National File Tracking System (NFTS);
8. Microfilm Digitization Application System (MIDAS);
9. Department of State (DOS) Consular Consolidated Database (DOS-CCD);
10. Reengineered Naturalization Applications Casework Systems (RNACS); and
11. Immigration and Customs Enforcement (ICE) SEVIS.

This update adds five new systems to the PCQS access capability:

12. ENFORCE Integrated Database (EID);

208, dated September 30, 1996.

⁴ 73 FR 10793, *System of Records Notice for the Verification Information System*, February 28, 2008; *Privacy Impact Assessment for USCIS Verification Information System Supporting Verification Programs*, April 1, 2007; *Privacy Impact Assessment Update for USCIS Verification Information System*, September 4, 2007; *Privacy Impact Assessment Update for USCIS Verification Information System Supporting Verification Programs*, February 22, 2008.



13. the Refugees, Asylum, and Parole System (RAPS);
14. the Executive Office Immigration Review System (EOIR);
15. the TECS Arrival/Departure Data Query (TECS SQ94); and
16. and the TECS Subject Lookout Search (SQ11).

Each of these new systems is described below.

1. ENFORCE Integrated Database (EID)

The ENFORCE Integrated Database (EID) contains biographic and case information on aliens encountered and booked in Immigration and Customs Enforcement (ICE) and other DHS component enforcement actions. ISVs will use EID as part of the secondary immigration status verification for both the SAVE and E-Verify programs. Information from EID is required by the ISVs in order to help determine whether an individual may not be eligible for employment, government benefit, credential, or other reason for which they are having their immigration status verified in the first place.

DHS components collect the information in EID during enforcement or administrative actions. Its use for verification of immigration status follows because in all cases that the verification is performed, authorization—whether it is for employment, benefit, credential, or other reason—may be contingent on not having been the subject of an enforcement action.

EID has no published PIA as it is a legacy system that was built prior to the enactment of the E-Government Act and the system itself has not undergone any substantial changes since 2002. The SORN for EID is entitled DHS/ICE-CBP-CIS-001-03 Enforcement Operational Immigration Records (ENFORCE/IDENT) SORN published March 20, 2006, at 71 FR 13987.

2. Refugees, Asylum, and Parole System (RAPS)

The Refugees, Asylum, and Parole System (RAPS) contains biographic information collected for USCIS Form I-589, Asylum Application. ISVs will use RAPS as part of the secondary immigration status verification for both the SAVE and E-Verify programs. Information from RAPS is required by the ISVs in order to help determine whether an individual may not be eligible for employment, government benefit, credential, or other reason for which they are having their immigration status verified in the first place.

DHS components collect the information in RAPS when an applicant for asylum completes a Form I-589. Its use for verification of immigration status follows because asylum brings with it access to certain benefits. It is essential to ensure that individuals are appropriately seeking verification for purposes of gaining employment, benefit, credential, or other reason.

Federal regulations at 8 CFR 208.6 prohibit the disclosure to third parties of information contained in or pertaining to asylum applications. Before an Immigration Status Verifier is assigned the PCQ Service Access Control Role for accessing data in RAPS, the Immigration Status Verifier must first sign a confidentiality agreement entitled Acknowledgement of Confidentiality Obligations Concerning Asylum-Related Information. This Non-Disclosure Agreement (NDA) specifies the end user's responsibility with



respect to prohibiting the disclosure to third parties of information contained in or pertaining to asylum applications. Unless the Immigration Status Verifier has signed this agreement, the PCQ Service System Administrators will not enable their access to query RAPS data.

RAPS has no published PIA as it is a legacy system that was built prior to the enactment of the E-Government Act and the system itself has not undergone any substantial changes since 2002. A draft SORN for RAPS is currently in development and will be reviewed by both USCIS and the DHS Privacy Office, ultimately to be published in both the Federal Register and the DHS website: www.dhs.gov/privacy.

3. Executive Office Immigration Review System (EOIR)

This Department of Justice system contains case-related information pertaining to aliens and alleged aliens brought into the immigration hearing process, including certain aliens previously or subsequently admitted for lawful permanent residence. EOIR contains the name, file number, address and nationality of aliens and alleged aliens, decision memoranda, investigatory reports and materials compiled for the purpose of enforcing immigration laws, exhibits, transcripts, and other case-related papers concerning aliens, alleged aliens or lawful permanent residents brought into the administrative adjudication process. ISVs will use EOIR as part of the secondary immigration status verification for both the SAVE and E-Verify programs when there is a question of immigration status. Information from EOIR is required by the ISVs in order to help determine whether an individual may not be eligible for employment, government benefit, credential, or other reason for which they are having their immigration status verified in the first place.

The information in EOIR was collected during an enforcement or administrative action. Its use for verification of immigration status follows because in all cases that the verification is performed, authorization—whether it is for employment, benefit, credential, or other reason—may be contingent on not having been the subject of an enforcement action.

EOIR currently has no published PIA as it is a legacy system that was built prior to the enactment of the E-Government Act and the system itself has not undergone any substantial changes since 2002. The SORN for EOIR is entitled Justice/EOIR-Records and Management Information System SORN published October 10, 1995, at 60 FR 52690 and updated July 5, 2001 at 66 FR 35458.

4. TECS Arrival/Departure Data Query

The TECS Arrival/Departure Data Query is actually a query of multiple data sources accessed in TECS which provides aggregated Arrival and Departure records for aliens from Form I-94 data keyed into the TECS SQ-94 repository, the primary history of crossing from TECS, passenger manifest information from the Advanced Passenger Information System (APIS), and the United States Visitor and Immigrant Status Indicator Technology (US-VISIT) crossing transactions as matched through APIS.

This is biographical data collected from persons entering and exiting the US primarily through air and sea ports. ISVs will use this data as part of the secondary immigration status verification for both the SAVE and E-Verify programs. ISVs use the information from TECS Arrival/Departure Data Query because it provides more timely confirmation of individual's entry and exit status than might be available through other systems to ensure that they have legally entered the US.



Arrival and departure data is used for establishing immigration status; it is one of the reasons that this information would have been collected in the first place.

TECS currently has no published PIA as it is a legacy system that was built prior to the enactment of the E-Government Act and the system itself has not undergone any substantial changes since 2002. The SORN for TECS is part of the Treasury/CS .244 Treasury Enforcement Communications System (TECS) SORN published October 18, 2001, at 66 FR 53029.

5. TECS Subject Lookout Search (TECS SQ11)

The TECS Subject Lookout Search (TECS SQ11) is a biographic query for individuals who are the subject of interest by DHS. ISVs will use TECS SQ11 as part of the secondary immigration status verification for both the SAVE and E-Verify programs. Information from TECS SQ11 is required by the ISVs in order to help determine whether an individual may not be eligible for employment, government benefit, credential, or other reason for which they are having their immigration status verified in the first place because they are the subject of a DHS lookout.

The information from the TECS SQ11 search is based on information about individuals who are a DHS subject of interest. Its use for verification of immigration status follows because in all cases that the verification is performed, authorization—whether it is for employment, benefit, credential, or other reason—it is presumed that these individuals are not the subject of a lookout.

TECS SQ11 currently has no published PIA as it is a legacy system that was built prior to the enactment of the E-Government Act and the system itself has not undergone any substantial changes since 2002. The SORN for TECS SQ11 is part of the Treasury/CS .244 Treasury Enforcement Communications System (TECS) SORN published October 18, 2001, at 66 FR 53029.

Privacy Risks

This new release of PCQS provides controlled access to five additional data sources or queries. Although any routine access to additional data sources is risk enhancing, because PCQS limits the initial access it provides to data—to only those data elements relevant to the query—it offers the lowest level of privacy risk. In order to mitigate privacy risks, the Verification Division provides extensive operational and privacy training and awareness for the use of the PCQS. In addition, the use of the system is monitored to ensure that it is not being misused.



As noted in the January 18, 2008 PIA, there are privacy risks associated with adding a new user to each of the connected systems, and where indicated above, adding additional purposes for the use of the information. The additional data sources have been added for specific purposes that met the original collection purposes and met the needs of the Verification Division to verify immigration status. While some of the data sources provide partially duplicative information from other data sources to which the ISVs currently have access, this is justified based on the need to ensure that the information is the most current and accurate. In addition, privacy risks are mitigated through this PIA Update, through the use of strong matching algorithms and presenting all results in a single view. This enables the user to directly compare information retrieved from multiple systems and determine whether there is inaccurate or incorrect information provided in the different systems.

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Original signed and on file with the DHS Privacy Office.

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