



Privacy Impact Assessment Update
for the

USCIS Person Centric Query Service

Supporting

The Verification Information System (VIS)

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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) Person Centric Query (PCQ) Service, operating through the USCIS Enterprise Service Bus (ESB) to describe the privacy impact of expanding the PCQ Service to include the following additional PCQ Client: The National Security and Records Verification Directorate/Verification Division's Verification Information System (VIS).

Introduction

The Verification Information System (VIS) is the technical infrastructure that enables USCIS to operate Systematic Alien Verification for Entitlements (SAVE) and E-Verify. VIS is a nationally accessible database of selected immigration status information containing in excess of 100 million records. Government agencies use SAVE to help determine whether a non-citizen is eligible for any public benefit, license, or credential based on citizenship and immigration status. Private employers and government users use E-Verify to determine whether a newly hired employee is authorized to work in the United States (U.S.).

The USCIS ESB is a set of commercial off-the-shelf software that provides a standardized infrastructure to connect to multiple systems and services within a Service Oriented Architecture (SOA). A separate PIA for the ESB is available on the Privacy Office website, www.dhs.gov/privacy. The PCQ Service is a composite service which allows users to submit a single query for all transactions involving an immigrant across a selected number of systems and returns a consolidated and correlated view of the immigrant's past interactions with the government as he or she passed through the U.S. immigration system. A separate PIA for the PCQ Service is also available on the Privacy Office website. A "PCQ Client" can be either an end user (a person) or another system invoking the PCQ Service query on behalf of an end user. A "connected system" is a system or data set (or database) that the PCQ Service accesses to either retrieve from or deliver to information.

As part of the SOA, the PCQ Service is designed to be reusable in that multiple PCQ Clients and connected systems can be arranged in different combinations to simultaneously serve different needs without the cost of individual system development efforts. While technically the same core "service" can be used and reused on an ongoing basis, the privacy assessment must be conducted separately for each unique combination of PCQ Clients and connected systems and each combination using personally identifiable information (PII) must satisfy privacy compliance requirements prior to deployment.



The Verification Division's VIS use of the PCQ Service was analyzed for potential privacy impacts and determined to comply with applicable privacy compliance documentation requirements. The existing PIAs and System of Records Notices (SORNs), related to the systems and information used in the VIS PCQ Client and connected systems, allow for the use of PII that is described in this PIA Update.

The owners of the connected systems providing the PII to be shared with the new PCQ Client formally agreed to share the PII and the Verification Division formally agreed to limit use of the PII to the manner described in this PIA Update.

The remainder of this PIA Update describes how the Verification Division through VIS will use the PCQ Service and verifies that the current privacy compliance documentation of each connected system accommodates the new PCQ Client's use of that system and the related PII.

New PCQ Client: The Verification Information System (VIS)

VIS will invoke the PCQ Service to augment and enhance the efficiency of retrieving data from the connected systems described below. VIS is the technical infrastructure that enables USCIS to operate the following two programs: (1) SAVE, for determining eligibility for government benefits; and (2) E-Verify, for determining whether a newly hired employee is authorized to work in the U.S. VIS, SAVE, and E-Verify are described more fully in the VIS SORN (72 FR 17569) and PIAs (www.dhs.gov/privacy).

VIS is an information technology system with a nationally accessible database of selected immigration status information containing in excess of 100 million records. Government agencies use SAVE to help determine whether a non-citizen is eligible for any public benefit, license, or credential based on citizenship and immigration status. Private employers and government users use E-Verify to determine whether a newly hired employee is authorized to work in the U.S.

As part of the primary automated status verification process, the VIS application will use the data results of the PCQ Query as part of an online immigration status verification algorithm to determine if a person has a valid immigration status to receive a government benefits or is eligible for employment. Although end users of VIS include other U.S. Government Agencies, local and state agencies, no end user of VIS will have access to, or be able to query the connected systems directly from VIS. Only the status verification algorithm within the VIS application itself uses the data from the connected systems to generate a Confirmation of Immigration Status or a Tentative Non-Conformation of Status.



VIS is comprised of citizenship, immigration, and employment status information from several DHS Systems of Records, including Customs and Border Protections' Treasury Enforcement Communication Systems (TECS) (66 FR 52984), Biometric Storage System (BSS) (72 FR 17172), USCIS's Central Index System (CIS) (72 FR 1755), and USCIS's Computer Linked Application Information Management System (CLAIMS 3) (64 FR 18052).

Connected Systems

A review of each of the below connected systems determined that this new PCQ Client's intended use of PII is covered by published privacy compliance documents, most of which are available on the Privacy Office website, www.dhs.gov/privacy.

1. Computer-Linked Application Management Information System 4.0 (CLAIMS 4)
2. Immigration and Customs Enforcement (ICE) Student Exchange Visitor Information System (SEVIS)
3. USCIS Reengineered Naturalization Applications Casework Systems (RNACS)

As noted in the PIA for the PCQ Service,¹ privacy risks are mitigated by using strong matching algorithms and presenting the results in a single view (identifying the source system for each response). 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.

¹ The PCQ Service PIA, "USCIS Person Centric Query (PCQ) Service, June 22, 2007," is available on the Privacy Office's website: www.dhs.gov/privacy, in the Citizenship and Immigration Services (USCIS) section of the PIA webpage.



1. Computer-Linked Application Management Information System 4.0 (CLAIMS 4)

The Computer-Linked Application Information Management System Version 4.0 (CLAIMS 4) was developed by the Immigration and Naturalization Service (INS) to provide immigration status verification information to help users determine eligibility for benefit requests and employment authorization requests, and to assist in the processing of applications related to naturalization or attaining U. S. citizenship.

VIS will use the following naturalization and citizenship information from CLAIMS 4:

- Alien Number (Identification ID),
- Social Security Number,
- Last Name,
- First Name,
- Middle Name,
- Birth Date,
- Birth Country,
- Nationality,
- Gender,
- Naturalization Verification (Citizenship Certificate Identification ID), and
- Naturalization Verification (Citizenship Naturalization Date/Time).

VIS is a new user of the information from CLAIMS 4 and will use the information for primary verification of immigration status for the E-Verify and SAVE programs. More information on automated VIS, E-Verify, and SAVE are available in the VIS SORN, PIAs, and the USCIS Verification Division's web site. This information will be used by VIS's online immigration status verification algorithm to determine if a person has a valid immigration status to receive a government benefits or is eligible for employment. This is similar in purpose for the use of the information by CLAIMS 4.

This system currently has no published PIA.

This IT system is covered by the CLAIMS 3/Claims 4 SORN, JUSTICE/INS-013, 62 FR 11919.

2. ICE Student Exchange Visitor Information System (SEVIS)

SEVIS maintains information on nonimmigrant students and exchange visitors (F, M and J Visas) and their dependents, and also on their associated schools and sponsors. SEVIS enables DHS



to maintain current information and facilitate oversight relating to nonimmigrant foreign students and exchange visitors during the course of their stay in the U.S.

VIS will use the following information from SEVIS:

- Social Security Number,
- Last Name,
- First Name,
- Middle Name,
- Birth Date,
- Birth Country,
- Nationality,
- Gender,
- Student Status,
- Visa Code,
- Status Change Date,
- Port of Entry Code,
- Non Citizen Entry Date,
- Status Code, and
- Program End Date.

VIS is a existing user of the information from SEVIS and will use the information for primary verification of immigration status for the E-Verify and SAVE programs. This information will only be used by VIS's automated online immigration status verification algorithm to determine if a person has a valid immigration status to receive a government benefits or is eligible for employment. This is similar in purpose for the use of the information by SEVIS.

The PIA for this connected system is entitled "The Student and Exchange Visitor Information System (SEVIS) Privacy Impact Assessment," published on February 5, 2005 and is available on the Privacy Office website, www.dhs.gov/privacy.

The SORN for this connected system is entitled Student and Exchange Visitor Information System DHS/ICE 001, 70 FR 14477, published in the Federal Register on March 22, 2005 and is available on the Privacy Office website, www.dhs.gov/privacy.

3. USCIS Reengineered Naturalization Applications Casework Systems (RNACS)

RNACS provides full case tracking and management capability for naturalization casework including assignment of cases to Case Control Offices (CCO); queuing of cases for appropriate actions, scheduling interviews and oath ceremonies; editing transactions; reporting; and production of correspondence.



VIS will use the following Naturalization and Citizenship information from RNACS:

- Alien Number (Identification ID),
- Last Name,
- First Name,
- Middle Name,
- Birth Date,
- Birth Country,
- Gender,
- Nationality,
- Naturalization Verification (Citizenship Naturalization Date/Time),
- Naturalization Verification (Citizenship Certificate Identification ID), and
- Immigration Status (Immigration Status Code).

VIS is a new user of the information from RNACS and will use the information for primary verification of immigration status for the E-Verify and SAVE programs. This information will be used by VIS's automated online immigration status verification algorithm to determine if a person has a valid immigration status to receive a government benefits or is eligible for employment. This is similar in purpose for the use of the information by RNACS.

This system currently has no published PIA, as this is a program that was developed prior to the enactment of E-government Act of 2002 and has not had any substantial changes requiring a PIA.

This system is covered by the JUSTICE/INS—031 SORN, 67 FR 20996.

Privacy Impact Analysis

There are two privacy risks related to adding a new user to each of the connected systems, and where indicated above, adding additional purposes for the use of the information. The first privacy risk is that the individual may not know that information provided will be used by new additional users ("PCQ Clients" as defined in the PCQ Service PIA), potentially for new additional purposes. The second privacy risk is that PII used from external systems of records could be used for purposes that are not compatible with the purpose of the original collection.

Both privacy risks are mitigated through this PIA Update to the PCQ Service, identifying the new user and, as indicated above, the potential new purposes for the additional use. The PIA Update to the PCQ Service provides a review section for each of the connected systems and describes the original purpose and the anticipated new purpose of the new PCQ Client, indicating when those purposes are the same and when the purposes are different.

In order to clearly indicate the updated uses of the information in these connected systems, the Privacy Office's website, www.dhs.gov/privacy, lists all updates to the PCQ Service PIA,



specifically identifying each new user through a dedicated PIA Update. In addition, a link to the PIA Update will also be listed under each of the connected systems to similarly indicate which existing systems will have new users and, potentially, new purposes for the new use.

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Approval Signature

Original signed and on file with the DHS Privacy Office

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