

# Department of Homeland Security **Office of Inspector General**

US-VISIT Faces Challenges in Identifying and  
Reporting Multiple Biographic Identities  
(Redacted)





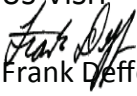
## OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

Washington, DC 20528 / [www.oig.dhs.gov](http://www.oig.dhs.gov)

August 13, 2012

MEMORANDUM FOR: Robert A. Mocny  
Director  
US-VISIT

FROM:   
Frank Deffer  
Assistant Inspector General  
Information Technology Audits

SUBJECT: *Letter Report: US-VISIT Faces Challenges in Identifying and Reporting Multiple Biographic Identities*

Attached for your information is our final letter report, *US-VISIT Faces Challenges in Identifying and Reporting Multiple Biographic Identities*. We incorporated the formal comments from the National Protection and Programs Directorate in the final report.

The report contains two recommendations aimed at improving US-VISIT. Your office concurred with both recommendations. As prescribed by the Department of Homeland Security Directive 077-1, Follow-Up and Resolutions for the Office of Inspector General Report Recommendations, within 90 days of the date of this memorandum, please provide our office with a written response that includes your 1) agreement or disagreement, 2) corrective action plan, and 3) target completion date for each recommendation. Also, please include responsible parties and any other supporting documentation necessary to inform us about the current status of the recommendation. Until your response is received and evaluated, the recommendations will be considered open and unresolved.

Consistent with our responsibility under the *Inspector General Act*, we are providing copies of our report to appropriate congressional committees with oversight and appropriation responsibility over the Department of Homeland Security. We will post the report on our website for public dissemination.

Major contributors to this report are John Kelly, Acting Deputy Assistant Inspector General; Tuyet-Quan Thai, Regional Director; Scott Wrightson, Audit Manager; and Josh Wilshere, Forensic Auditor.

Please call me with any questions, or your staff may contact Quan Thai, Regional Director, at 425-582-7861.

Attachment



## Background

US-VISIT is a program administered by the Department of Homeland Security's (DHS's) National Protection & Programs Directorate (NPPD). US-VISIT's goals are to enhance the security of U.S. citizens and visitors, facilitate legitimate travel and trade, ensure the integrity of the U.S. immigration system, and protect the privacy of visitors. To achieve these goals, the program processes and maintains biographic and biometric information collected by other Federal entities such as the State Department and U.S. Customs and Border Protection (CBP).<sup>1</sup> US-VISIT also shares information on the entry and departure of foreign visitors who pass through U.S. ports of entry. US-VISIT processes biometric information such as fingerprints and photographs that, along with other biographic and biometric information that it shares with other Federal entities, can be used to verify foreign nationals' identities, authenticate travel documents, and determine the admissibility of visitors, immigrants, and refugees. The biometric identification services that US-VISIT provides are designed to help decision makers throughout the immigration, border management, law enforcement, and intelligence communities to accurately identify the people they encounter and determine whether those people pose a risk to the United States.

As the repository of biometric and biographic data, US-VISIT interfaces with numerous other Federal systems, including the following:

- Advance Passenger Information System
- Arrival Departure Information System
- Automated Biometric Identification System
- Computer Linked Application Information Management Systems
- Consular Consolidated Database
- Image Storage and Retrieval System
- Integrated Automated Fingerprint Identification System
- Student and Exchange Visitor Information System
- DHS/CBP-011 TECS

These systems provide biometric and biographic information to US-VISIT for foreign visitors, visa applicants, and certain criminals. US-VISIT personnel can then analyze this information and share it with other Federal, State, and local entities.

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<sup>1</sup> Biographic information may include a person's name and date of birth. Biometric information may include a person's fingerprint image or photograph collected at a port of entry.



According to the US-VISIT program office, for each encounter (i.e., each time an international traveler passes through a U.S. port of entry), US-VISIT checks the person's biometrics against a biometric watch list of more than 6.4 million known or suspected terrorists, criminals, and immigration violators identified by U.S. authorities and Interpol. When a foreign visitor presents an identification document, US-VISIT can check the person's biometrics against other files that could be accessed to ensure that the document belongs to the person presenting it and not to someone else. Finally, other Federal law enforcement and Intelligence Community organizations can request that US-VISIT provide biographic and biometric information in the course of their investigations and/or research.

## Results of Review

US-VISIT faces challenges in systematically identifying and flagging potential use of fraudulent biographic identities. Our analysis of Automated Biometric Identification System (IDENT) data found 825,000 instances where the same fingerprints were associated with different biographic data.<sup>2</sup> These differences ranged from misspelled names and transposed birth dates to completely different names and birth dates. According to US-VISIT officials, US-VISIT has instituted programs to identify individuals who may have overstayed the condition of their visas, and has performed manual procedures to analyze entry and exit data to associate fingerprints with biographic information. However, US-VISIT has not developed [REDACTED]

[REDACTED] This information may assist CBP officers in identifying aliens using potentially fraudulent information at ports of entry.

Although most of the hundreds of thousands of discrepant records involve data integrity errors likely occurring at the point of collection, we found instances where individuals may have supplied different names and dates of birth at ports of entry. In some cases, we found that individuals used different biographic identities at a port of entry after they had applied for a visa under a different name or been identified as a recidivist alien.

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<sup>2</sup> The 825,000 records represent 0.2 percent of overall IDENT encounter data we received from US-VISIT. Although this is a very small percentage of the total records, the volume of records makes it significant.

<sup>3</sup> Other controls during the entry process may help to mitigate some risk of biographic identity fraud. For example, during the biovisa application process for people from countries who are required to have visas to enter the United States, State Department personnel are supposed to check a person's fingerprints against all previous biographic records for that set of fingerprints to ensure that the person has not previously used a different set of biographic information to enter the United States.



The “Data Quality Act”<sup>4</sup> or “Information Quality Act” requires Federal agencies to use and disseminate accurate information. Inaccurate and inconsistent information related to hundreds of thousands of individuals reduces the accuracy of US-VISIT data monitoring and impedes US-VISIT’s ability to verify that individuals attempting to enter the United States are providing their true names and dates of birth.

**US-VISIT Needs to Improve Procedures That Specifically Target Individuals Using Multiple Biographic Identities To Enter the United States**

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US-VISIT has [REDACTED] to determine if individuals are using multiple biographic identities when attempting to enter the United States. We found evidence that IDENT data contain entry records for hundreds of thousands of individuals whose biographic data were different than their biometrics (i.e., individuals with the same fingerprints had different names and/or dates of birth recorded for different encounters). Given that there are hundreds of millions of biometric records in IDENT, if US-VISIT [REDACTED]

[REDACTED] US-VISIT offers decision makers limited assistance [REDACTED]

US-VISIT officials said that US-VISIT regularly compares visa information against entry and departure data to identify individuals who have overstayed their immigrant or visitor visas. It regularly provides overstay information to Immigrations and Customs Enforcement (ICE) to help identify and apprehend overstays. US-VISIT also has established overstay outlooks so CBP officers and Department of State personnel can be warned of potential overstays seeking reentry to the United States. This process replaced a system where individuals overstaying the terms of their admission to the United States were identified only on an ad hoc basis as part of contact they had with law enforcement. In fiscal year 2011, US-VISIT provided ICE with more than 900 visas overstay leads per week.

US-VISIT also has an identity resolution process to manually review instances where differences in biographic data—for the same sets of biometrics—can be attributable to input and other data errors. To achieve this objective, US-VISIT analysts may determine whether records with slightly different biographic information belong to a single individual, or may have been incorrectly inputted at the point of collection. Analysts then update the system to reflect that decision. For example, US-VISIT analysts may view several biographic records associated with the same fingerprint information and

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<sup>4</sup> *Treasury and General Government Appropriations Act for Fiscal Year 2001* (Public Law 106-554), P. L. 106-554, § 515, 114 Stat. 2763A- 153 to 2763A-154 (2000) (44 U.S.C. § 3516 note). The law is referred to as the Data Quality Act or, alternatively, the Information Quality Act.



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determine that one of the biographic records contains a typographical error. These analysts will then resolve the records in the system as a single individual or multiple individuals. Through this process, US-VISIT works to refine the reliability of the data it uses and provides to other Federal agencies.

However, US-VISIT's current identity resolution effort is not designed to specifically target individuals who are using multiple identities to enter the United States. US-VISIT program officials informed us that most of the additional research they perform is based on identity resolution of people who appear to be the same, but have different information recorded in US-VISIT data.<sup>5</sup> According to US-VISIT officials, US-VISIT manually reviews IDENT encounters with multiple biographic records to identify potential identity fraud. However, US-VISIT did not provide evidence to document that it has determined whether all unresolved discrepancies—arising when distinctly different biographical information share the same set of fingerprints—indicate that fraud may have occurred.

### **Data Inconsistencies Hinder Effective Use of Biometrics to Identify and Prevent Use of Fraudulent Identities at U.S. Ports of Entry**

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The number of records with inconsistent biographic data limits the effectiveness and efficiency of using biometrics to identify and prevent the use of fraudulent identities at U.S. ports of entry. The Data Quality Act requires that information disseminated by agencies have maximum quality and integrity. However, we found numerous data integrity errors in IDENT. These errors require US-VISIT to conduct an extensive manual reconciliation process of biographic information belonging to the same individuals. This process limits US-VISIT's ability to quickly identify instances where multiple biographic data are attributable to fraud rather than data entry errors. Our work identified examples where individuals may have attempted to enter the country using different names and birth dates, sometimes after having been flagged within IDENT as having derogatory information. These examples emphasize the need to provide CBP officers at ports of entry and State Department personnel with information to properly vet individuals before allowing them to enter the United States.

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<sup>5</sup> Since 2005, US-VISIT has identified two instances of biographic fraud and referred them to ICE for further evaluation.



## US-VISIT Data Contain Hundreds of Thousands of Records With Inconsistent Biographic Information

We found about 825,000 records in IDENT belonging to 375,000 individuals where key biographic data, such as the name and/or date of birth, did not match other records with the same fingerprint identification number (FIN).<sup>6</sup> These 375,000 individuals had more than 4.7 million nonenforcement<sup>7</sup> records in IDENT data, including encounters at ports of entry, applications for visas, and visa extensions. More than 4 million (85 percent) were encounters at ports of entry. Enforcement data present another significant challenge, since they rely heavily on biographic data [REDACTED]

## Data Entry Errors and Test Data Pose a Challenge to Effective Analysis of US-VISIT Biometric Data

Most of the erroneous records where multiple biographic identities were associated with the same biometrics appear to be data integrity errors. Specifically, we found that the biographical data that US-VISIT provided from its production environment contained test data submitted by other Federal and law enforcement agencies that are linked to specific FINs. We also found inconsistencies in recording last and first names, in the birth date format used, and in gender-based records, as well as other conditions. Without ensuring data consistency and identifying instances where different names arise from the use of different biographic identities, US-VISIT may be unable to provide timely information that can prevent the use of fraudulent identities to enter the United States.

The Data Quality Act requires Federal agencies to ensure and maximize the quality, utility, and integrity of the data they disseminate.<sup>9</sup> Further, the *Standards for Internal Control in the Federal Government*,<sup>10</sup> which establishes minimal level of quality acceptable for internal control in government, requires that transactions and events be

<sup>6</sup> Biographic discrepancies can occur at the point of collection from inaccurate input by hand, unsuccessful scan or swipe of a document, or the accidental swap of a document with a traveling companion. They can also occur from systems parsing biographic information differently from the same document.

<sup>7</sup> Nonenforcement records include encounters such as an individual's visits to the United States or applications for a visa to enter the United States, but do not include encounters such as contacts with U.S. law enforcement related to immigration violations or criminal activity.

<sup>8</sup> [REDACTED]

<sup>9</sup> The Data Quality Act is operationalized in the *Federal Information System Controls Audit Manual*, which states that the key data elements of an agency's transactions must be accurate and represent real transactions, as opposed to test transactions.

<sup>10</sup> GAO/AIMD-00-21.3.1, *Standards for Internal Control in the Federal Government*, November 1999.



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recorded accurately. Inconsistencies in key biographic information between records belonging to a single individual reduce the ability of US-VISIT to meet the Federal information system and internal control standards. In addition, these inconsistencies can make it difficult to distinguish between data entry errors and individuals potentially committing identity fraud. We found that data integrity issues most likely account for most of the 450,000 biographic records that did not match other biographic records for the same fingerprint. Specifically,

- US-VISIT collects data from numerous other Federal agencies, each with its own data format and collection mechanism. For example, one agency may enter an individual's name and date of birth manually while another may collect the information automatically from a passport. These differences result in data entry errors such as misspellings and transpositions. For example, over a period of 5 years, one individual's name was spelled 17 different ways.
- Test data existed in the information that US-VISIT provided to us as encounter data. For example, in a number of instances, we found records with the same FIN but with made-up names such as "Mickey Mouse" and "Jarvis Sample."
- Inconsistent recording of biographic information exists at ports of entry. In one example, an individual's first, middle, and last names were recorded in IDENT in different combinations. In another example, an individual had 14 different combinations of months, days, and years for the birth date recorded under the same name in encounters from 2004 to 2011.
- We found instances where the same fingerprints may have been used when processing travelers at a port of entry. In one instance, we found that the same set of fingerprints was used for seven different individuals who entered the country over the course of a few hours.<sup>11</sup> Without isolating these errors, US-VISIT will face additional difficulty in distinguishing biographic fraud from data collection errors.

We also found that gender-based and other conditions may reduce the consistency of biographic and biometric information within IDENT. For example,

- We found that nearly 400,000 records for women have different last names for the same first name, date of birth, and FIN. According to US-VISIT officials, these instances are likely women who changed their names after a marriage.

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<sup>11</sup> When provided documentation for this example, US-VISIT asserted that the same fingerprints were recorded as the result of a fingerprint scanner ghost image.





- Names of international travelers were not always captured at ports of entry. For example, we found that 244,000 individuals (as identified by their unique FIN) with nearly 1 million encounters at ports of entry did not have specific biographic identities. Instead, they were identified in IDENT simply as “frequent traveler.”
- Dates of birth were not always captured or fell outside of a reasonable range. Specifically, we found more than 25,000 records where the dates of birth were not recorded or were outside of normal ranges. For example, we found that some international travelers entering the United States were recorded as having dates of birth in the year 2049. Without accurate biographic information, US-VISIT faces challenges in fulfilling its mission of using biometrics to prevent identity fraud and deprive criminals and immigration violators of the ability to cross our borders.

### **Examples of Individuals Attempting To Enter the Country Under Multiple Biographic Identities**

Although most of the biographic data discrepancies in IDENT data can be attributed to data entry errors, we identified instances where individuals appeared to have used different names and dates of birth to attempt to enter the United States. These individuals attempted to enter the country multiple times over several years under different biographic data. In one example, the same set of fingerprints was associated with nine different names and nine different birth dates in 10 different attempts to enter the United States. In another example, the same individual (as identified by the same set of fingerprints) had eight different names and eight different birth dates listed in IDENT data for nine attempts to enter the United States. [REDACTED]

In addition to individuals who [REDACTED] the data pointed to a limited number of instances where an individual with a derogatory record supplied different biographic information to CBP officers to attempt to enter the United States.<sup>12</sup> For example:

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<sup>12</sup> Subsequent to our analysis, we provided US-VISIT with a file containing information on individuals who were recorded at ports of entry with different biographic information with the same FINs. US-VISIT then made available to us information about derogatory information on these individuals.



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- A male who used two different names and dates of birth to attempt to enter the United States in 2008 and 2011 was identified as a repeated criminal (recidivist) alien.<sup>13</sup>
- A male used two different identities to apply for visas from the Department of State. After being denied entry in 2009 he used yet a third name and date of birth to attempt to enter the country later in the same year, and was refused entry.
- A female who was identified as a recidivist alien in 2008 used different biographic data to visit the United States, once in 2009 and twice in 2011.
- A female who was identified as a recidivist alien in 2006 attempted to enter the country on three visits in 2009, 2010, and 2011 under variations of the same name.

### Conclusion

Significant inconsistencies exist in the biographic information that US-VISIT maintains on foreign visitors and aliens entering and exiting the United States. Although most of the inconsistencies can be attributable to data input issues, US-VISIT is unable to quantify the extent to which the same individuals provided different biographical data to circumvent controls and enter the United States improperly. Without this information, US-VISIT may be hindered in its ability to share information that could help border enforcement agencies prevent improper entries into the United States. We will provide the results of our analysis of multiple biographic identities to US-VISIT for further research and potential action.

### Recommendation(s)

We recommend that the Director, US-VISIT:

Recommendation #1:

Review data inconsistencies that we have provided to the US-VISIT office to determine if additional examples of biographic fraud exist beyond the two cases that it previously referred to ICE.

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<sup>13</sup> US-VISIT has stated that bulleted examples 1 and 3 are results of incorrectly entered derogatory information in the system that will require data cleanup.



**Recommendation #2:**

Provide information on individuals determined to be using multiple biographic identities to appropriate law enforcement entities for identity fraud resolution and possible inclusion on the biometric watch list so they are identifiable when entering the United States.

## **Management Comments and OIG Analysis**

We obtained written comments on a draft report from the Under Secretary, NPPD. We have included a copy of the comments in their entirety in appendix B.

In the comments, the DHS Under Secretary for NPPD concurred with both report recommendations and provided comments on specific areas within the report. We have reviewed management's comments and provide an evaluation below.

In response to our first recommendation, the DHS Under Secretary for NPPD requests that we remove the word "additional" from our recommendation when referring to examples of biographic fraud. We have changed the report language to refer more clearly to the two cases of biographic fraud that NPPD previously referred to ICE.

In response to our second recommendation, the DHS Under Secretary for NPPD states that US-VISIT has initiated a proactive review of processes to identify potential fraud used by individuals attempting to enter the United States or obtain immigration benefits. This is performed through a review of multiple alien registration numbers. NPPD reported that to date, US-VISIT has researched more than 1,200 records and added 192 individuals to the Watch List.

We believe that the actions that have been initiated partially satisfy the intent of this recommendation. However, US-VISIT also needs to expand its analysis to include the review of potential identity fraud associated with international travelers, including travelers from visa waiver countries who did not have alien registration numbers or did not have to apply for visas from the Department of State. Without a comprehensive plan to include these travelers, US-VISIT will not be able to identify all individuals who may be using multiple biographic identities.

In response to our report, NPPD also stated that US-VISIT provides a layer of defense but is not the only line of defense against identity fraud, and that CBP also plays a critical role in identifying individuals who use multiple biographic identities to enter the United States.

We acknowledge that the security infrastructure at U.S. borders is layered, and that the critical work performed by CBP and the Department of State mitigates some of the security



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risk. However, this report is not intended to be a broad overview of the entire security of our borders. Rather this report specifically addresses US-VISIT's role in safeguarding against identity fraud. By taking a greater proactive role in identifying and alerting CBP officers of potential identity fraud, US-VISIT can provide valuable information to aid in securing our borders.



## **Appendix A**

### **Objectives, Scope, and Methodology**

The Department of Homeland Security (DHS) Office of Inspector General (OIG) was established by the *Homeland Security Act of 2002* (Public Law 107-296) by amendment to the *Inspector General Act of 1978*. This is one of a series of audit, inspection, and special reports prepared as part of our oversight responsibilities to promote economy, efficiency, and effectiveness within the Department.

Based on preliminary findings from survey work performed at United States Citizenship and Immigration Services, we initiated a review of US-VISIT's internal controls over biographic identities. The objectives of the review were to determine whether (1) US-VISIT has internal controls and procedures in place to identify individuals who use multiple biographic identities to attempt to enter the United States, and (2) indications exist that individuals sought to enter the United States using different identities.

To determine whether US-VISIT has internal controls and procedures in place to identify individuals who use multiple biographic identities to attempt to enter the United States, we obtained US-VISIT's encounter, biographic, and document records from IDENT for 1998 through 2011. We eliminated nonentry encounters, including enforcement and data-sharing records, from our analysis. We identified instances where individuals may have used multiple biographic identities by comparing the names and dates of birth recorded in US-VISIT records for encounters belonging to a single fingerprint identification number. In this effort, we utilized the expertise of an outside contractor, Eastport Analytics, as well as our own analysis. We followed up on the results of our analysis by interviewing US-VISIT staff and reviewing documents provided by US-VISIT.

To determine whether indications exist that individuals sought to enter the United States using different identities, we analyzed the results of the analysis to test whether there was evidence of use of multiple biographic identities. We provided a limited set of those results to US-VISIT staff to obtain any derogatory information related to the entry encounters of those individuals. Finally, we reviewed encounter, biographic, and derogatory records related to some of those individuals. We briefed US-VISIT concerning the results of fieldwork and the information summarized in this report.

We conducted this performance audit between September 2011 and March 2012 pursuant to the *Inspector General Act of 1978*, as amended, and according to generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based upon our audit objectives. We believe that



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the evidence obtained provides a reasonable basis for our findings and conclusions based upon our audit objectives.



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Appendix B  
Management Comments to the Draft Letter Report

Office of the Under Secretary  
National Protection and Programs Directorate  
U.S. Department of Homeland Security  
Washington, DC 20528



Homeland  
Security

MAY 07 2012

Mr. Frank Deffer  
Assistant Inspector General for Information Technology  
Office of Inspector General  
Department of Homeland Security  
Washington, D.C. 20528

Dear Mr. Deffer:

Re: OIG-11-123-ITA-NPPD, *US-VISIT Faces Challenges in Identifying and Reporting Multiple Biographic Identities*

The Department of Homeland Security (DHS)/National Protection and Programs Directorate (NPPD)/ United States Visitor and Immigrant Status Indicator Technology (US-VISIT) Program appreciates the opportunity to review and respond to the Office of Inspector General (OIG) report 11-123-ITA-NPPD, *US-VISIT Faces Challenges in Identifying and Reporting Multiple Biographic Identities*. NPPD/US-VISIT is working to resolve the issues identified by the OIG.

Both NPPD/US-VISIT and Customs and Border Protection (CBP) provided technical comments under separate cover. The draft report contained two recommendations directed at NPPD/US-VISIT with which the Department concurs. Specifically, OIG recommended that the Director of US-VISIT:

**Recommendation 1:** *Review data inconsistencies that we [OIG] have provided to the US-VISIT office to determine if additional examples of biographic fraud exist.*

Concur. US-VISIT is examining the documentation provided to determine if any examples of biographic fraud exist. However, NPPD/US-VISIT suggests removing “additional” from the recommendation since no examples of fraud were actually identified.

**Recommendation 2:** *Provide information on individuals determined to be using multiple biographic identities to ICE for identity fraud resolution and possible inclusion on the watchlist so they are identifiable when entering the United States.*

Concur. US-VISIT has initiated a proactive review of processes to identify potential fraud used by individuals attempting to enter the United States or obtain immigration benefits. The identification of fraud is discovered through the extraction of multiple Alien Registration numbers within the IDENT database by country. Once Alien Registration numbers are identified, an Identity Fraud unit researches each record for variations possibly used for the purpose of fraud. After research is conducted and fraud is suspected, the IDENT record is promoted to the IDENT Watch List. After suspected fraud cases are promoted to the watch list, the appropriate stakeholder is notified; subjects suspected of fraud may be or have already



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Mr. Frank Deffer  
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attempted to commit passport fraud, USC citizenship/Lawful Permanent Resident fraud, and fraud involving possible alien smuggling. To date, US-VISIT has researched over 1,200 records and promoted 192 individuals to the Watch List.

In addition to the specific recommendation responses above, NPPD has consulted with CBP for their input to this response. We value the OIG's analysis and findings; however, we believe it would have been stronger had the OIG engaged CBP during the audit. Since the focus of this audit was data gathering at ports of entry, we believe CBP's critical role in identifying individuals who use multiple biographic identities to enter the United States should also have been reviewed and evaluated. US-VISIT provides a layer of defense but not the only line of defense. Most notably, CBP Officers (CBPOs) use technology as a tool while conducting inspections, but this is not the sole basis on which an admission referral is made. CBPOs conduct a thorough inspection of each traveler for admission using a variety of tools and techniques. For instance, CBPOs work to ensure the identification of inadmissible travelers during primary inspection through document examination skills, facial recognition skills and interviewing techniques, among other techniques.

Again, we thank you for the opportunity to review and provide comment on this draft report, and we look forward to working with you on future homeland security engagements.

Sincerely,

A handwritten signature in blue ink, appearing to read "R Beers".

Rand Beers  
Under Secretary





## **Appendix C**

### **Report Distribution**

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