



**Privacy Impact Assessment Update
for the**

**Systematic Alien Verification for
Entitlements Program**

DHS/USCIS/PIA-006(b)

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Abstract

The Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS), Verification Division is publishing this update to the Systematic Alien Verification for Entitlements (SAVE) Program Privacy Impact Assessment (PIA) dated August 26, 2011. SAVE is a fee-based inter-governmental initiative designed to help federal, state, tribal, and local government agencies confirm status prior to granting benefits and licenses, as well as for other lawful purposes. The purpose of this update is to: 1) describe the expanded use of the Photo Matching Tool technology; and 2) introduce the implementation of the electronic form G-845, *Document Verification Request*.

Overview

USCIS administers the SAVE program, a fee-based inter-governmental initiative designed to help federal, state, tribal, and local government agencies and licensing bureaus confirm immigration status information. SAVE provides immigration status to the extent that such confirmation is necessary to enable the federal, state, tribal, or local government agencies to make decisions related to: (1) determining eligibility for a federal, state, or local public benefit; (2) issuing a license or grant; (3) issuing a government credential; (4) conducting a background investigation; or (5) any other lawful purpose.

A federal, state, tribal, or local government agency that provides a public benefit or license, or that is otherwise authorized by law to engage in an activity related to the verification of immigration status, may enroll in SAVE as a customer agency. By using SAVE, eligible customer agencies can request immigration status information in order to make a determination regarding the applicant's eligibility for the benefit or license they administer. Applicants do not interact directly with SAVE. The applicant only interacts with the customer agency that is issuing the license or benefit. The customer agency uses SAVE to verify an individual's immigration status. SAVE provides the necessary information to the agencies to enable them to make informed decisions prior to issuing benefits or licenses. The customer agency analyzes the SAVE response against its own eligibility criteria to make a determination. Customer agencies do not inform SAVE of the final outcome of the benefit adjudication.¹

Reason for the PIA Update

USCIS is updating the August 26, 2011 SAVE PIA to: 1) describe the expanded use of the Photo Matching Tool technology; and 2) introduce the implementation of the electronic form G-845, *Document Verification Request*.

Photo Matching Tool

The August 26, 2011, SAVE PIA introduced the Photo Matching Tool for Departments of Motor Vehicles (DMV) that access the SAVE system through the American Association of Motor Vehicle Administrators Network (AAMVANet). The Photo Matching Tool is a process whereby a DMV submits a query to SAVE for verification of an applicant's status using the USCIS-issued Permanent Resident

¹ See the original SAVE Program PIA (DHS/USCIS/PIA-006) available at www.dhs.gov/privacy for additional information on the status verification process.



Card or Employment Authorization Card that an applicant presents to DMV personnel. SAVE retrieves and displays the applicant's personally identifiable information (PII), including a photograph, from various USCIS sources including the Customer Profile Management System (CPMS) to allow the DMV to determine if the information and photograph displayed in SAVE via CPMS matches the information the applicant presented to DMV personnel.² The information and the photograph SAVE displays should match the information the applicant shows to DMV personnel because the applicant presented a USCIS-issued identifying document that USCIS originally generated to administer the immigration benefit.³ DMVs use the information in this query as part of their decision-making process for driver's license or identification card issuance.

With this update, the Photo Matching Tool is now available to all SAVE customer agencies, not only DMVs, in order to meet the demands for greater security in combating document fraud.⁴ SAVE customer agencies can now indicate the desire to use the web interfacing Photo Matching Tool in their registration profile when enrolling in SAVE. If customer agencies select this option, they will now be able to confirm whether the photograph on a USCIS-issued identification card (e.g., the Permanent Resident Card or the Employment Authorization Card) an applicant presents is a match to the USCIS photograph on record returned by SAVE. SAVE will check the DHS Document Number⁵ against the USCIS Central Index System (CIS)⁶ to ensure it displays the correct photo with the applicant's record to reduce the risk of a photo mismatch.

The SAVE customer agency will visually compare the photograph obtained from SAVE with the photograph provided by the applicant to ensure there is a match. When SAVE displays the photo, customer agencies will indicate either "Yes" the photos are a match or "No" the photos do not match. SAVE retains the "Yes" or "No" response for historical purposes and to indicate why SAVE required the Manual Verification procedure, described below. Previously, DMVs only used the Photo Matching Tool during the final verification step, which is a manual search of systems, and only if the DMV could not verify the individual's immigration status and identification in any of the previous steps. With this update, the Photo Matching Tool is now part of the initial verification step. Accordingly, SAVE customer agencies now use the Photo Matching Tool at the beginning of the process to avoid having to submit a paper G-845, *Document Verification Request* in the final step. This enhancement uses matching algorithms to reduce the amount of mismatches, response time, and workload by SAVE customer agencies.

² For more information on CPMS, please refer to the forthcoming PIA at www.dhs.gov.

³ There may be instances where the information displayed in SAVE by CPMS does not match the information the applicant presents. For example, due to marriage an individual's full name may not match the full name in CPMS. If this occurs, SAVE customer agencies can decide whether to accept proof of the name change (e.g., marriage certificate) in order to process the benefit.

⁴ Currently, there are more than 1,000 federal, state, tribal, and local government agencies that use SAVE to receive immigration status information in response to their queries.

⁵ This is a serial number located on the back of the Permanent Resident and Employment Authorization Card and is specific to each applicant.

⁶ For more information on CIS, please refer to the DHS/USCIS/PIA-009 Central Index System at www.dhs.gov.



Electronic Form G-845, *Document Verification Request*

If SAVE is unable to find a record pertaining to the applicant or the record has discrepant information or a photo mismatch, SAVE displays an “Institute Additional Verification” message to the customer agency. As outlined in the Memorandum of Agreement (MOA) between USCIS and all SAVE customer agencies, if the system displays this message, customer agencies are required to verbally notify the benefit applicant that they cannot verify the applicant’s eligibility for the benefit but that there is an additional manual verification option. If the applicant requests manual verification, SAVE customer agencies must submit the Form G-845, *Document Verification Request* and all applicable documents, such as photocopies of the applicant’s immigration documents.⁷ The G-845 is a manual verification step that provides a form of redress to those applicants whose status the customer agencies have not otherwise been able to verify through SAVE. This entails an in-depth manual query by USCIS Immigration Status Verifiers to determine the applicant’s immigration status. Previously, SAVE customer agencies could only submit hardcopies of the form and the applicable immigration documents by fax or mail.

With this update, USCIS is implementing an electronic G-845 to automate this step of the additional verification procedure. A virtual display of the form will now appear when the customer agency provides a “No” response. SAVE customer agencies can then enter the required additional information directly into SAVE. Additionally, SAVE customer agencies can now scan and upload applicable immigration documents necessary to resolve the information discrepancy directly into the SAVE system for submission to USCIS Immigration Status Verifiers.⁸ The USCIS Immigration Status Verifiers will perform the in-depth additional verification queries, as described in the August 26, 2011 PIA, and return responses to the customer agencies electronically.

This new automated form also allows applicants to check the progress of their G-845 online, if customer agencies select this option as part of their registration profile. If so, SAVE assigns a Case Verification Number to the electronic G-845. The customer agency provides this number to the applicant so that he or she can use the SAVE web-based case tracking service, SAVE Case Check. SAVE Case Check enables an applicant to track the resolution status of the G-845. SAVE Case Check prompts applicants to input their Case Verification Number.⁹ Upon entering the number, the webpage displays that the case is: 1) undergoing review; 2) not found; or 3) resolved. If individuals receive notice that their case was resolved, SAVE Case Check instructs applicants to contact the benefit-granting agency for further information about the case. The case tracking service only collects the Case Verification Number and does not collect or display any PII.

If this final manual verification step is unable to resolve a photo mismatch, the customer agency advises the applicant to make an InfoPass appointment at a USCIS District Office so that an Immigration Information Officer (IIO) can conduct further research to resolve the discrepancy. As appropriate, the IIO can correct USCIS data or refer the applicant to the data owner, e.g., U.S. Customs and Border Protection.¹⁰

⁷ The G-845, *Document Verification Request*, and supplement are available at www.uscis.gov/forms.

⁸ The front and back copies of the documents are required for comparison of the information in the USCIS databases for error detection.

⁹ The web-based case tracking service, SAVE Case Check, is available at www.uscis.gov/save

¹⁰ InfoPass is a free Internet service that enables individuals to schedule appointments with a USCIS Immigration Officer at any



This new automated process does not retire the option of paper form G-845. SAVE will also continue to process hardcopies of the G-845 and supporting documents sent from customer agencies by mail or fax. The manual process as described in the August 26, 2011 PIA remains unchanged. However, this new feature reduces processing time, which ultimately benefits the applicant and the SAVE customer agency.

Privacy Impact Analysis

The System and the Information Collected and Stored within the System

There is no change in the information SAVE collects and stores as outlined in the previous SAVE PIAs (DHS/USCIS/PIA-006 and DHS/USCIS/PIA-006(a)). The Photo Matching Tool and electronic form G-845 enhancements described in this update do not affect the type or amount of PII collected, since USCIS does not collect new PII.

Uses of the System and the Information

The SAVE program continues to check immigration status for granting benefits, licenses, and other lawful purposes as described in the previously published SAVE PIA (DHS/USCIS/PIA-006). However, as a result of this update, there is a process change and additional privacy risks.

USCIS is advancing the Photo Matching Tool from the final step of the verification process to the first step. However, the use of the information remains consistent with the original purpose outlined in the DHS/USCIS/PIA-006. This technical change in the processing sequence accelerates the process and reduces the occurrence of photograph mismatches, which benefits both the SAVE customer agency and the applicant.

Privacy Risks:

As a result of the expansion of the Photo Matching Tool, there is an increased privacy impact. There is a risk that SAVE customer agency employees may use the photos for an unauthorized purpose or unauthorized replication. The following mitigates these risks:

Unauthorized use: SAVE's comprehensive audit trail tracking and maintenance functionality mitigates the risk of unauthorized use. Audit measures track and store information on users who submit queries, including: when the query was processed; what the response was; who receives the response; and, when SAVE receives the response. The audit logs restrict access based on user roles. USCIS externalized these logs from system administration access methods and protected them from modification. USCIS periodically reviews the audit logs for monitoring user activity.

USCIS requires all SAVE customer agencies to abide by all security requirements as agreed to upon enrollment in SAVE through MOAs and described in SAVE PIA (DHS/USCIS/PIA-006). Attempts to evade the security controls can result in loss of access to SAVE. The SAVE Monitoring and Compliance Branch (M&C) periodically reviews SAVE for misuse, abuse, discrimination, breach of privacy, and fraudulent use of SAVE. M&C continues to follow procedures according to signed

time of day or night. If an applicant has an immigration issue that is best handled by a trained USCIS Immigration Officer, InfoPass enables the applicant to schedule an appointment instead of requesting it in person at a local USCIS office.



agreements and interim guidance, published at 62 FR 61344, to prevent unauthorized use and abuse of the system. USCIS restricts M&C analysts to monitoring SAVE usage for only the DHS-approved behaviors described in the PIA and SORN for the Compliance Tracking and Management System (CTMS).¹¹

Unauthorized replication: USCIS mitigates this risk with two-factor protection of the photographs by using a watermark and shrink wrapping. The watermark, a visible embedded image overlay on a digital photograph consisting of text, a logo, or a copyright notice, identifies the photograph as having ownership by another entity.

Shrink wrapping is a clear transparent image placed over another digital image that deters the possibility of reusing a photograph. These protections alleviate the risk of someone replicating the photograph for unofficial purposes.

Retention

The only change in retention is that the form G-845 and the associated immigration documents, are now retained electronically as part of the SAVE case file. These documents in electronic form remain subject to the SAVE National Archives and Records Administration schedule, N1-566-08-7, approved June 5, 2008, as described in the August 26, 2011 SAVE PIA.

Internal Sharing and Disclosure

There is no change in the DHS internal sharing and disclosure as described in the SAVE PIAs (DHS/USCIS/PIA-006 and DHS/USCIS/PIA-006(a)). USCIS will continue to share and disclose information with DHS components for law enforcement purposes when SAVE detects possible fraud and/or misuse, on a case-by-case basis. This internal sharing and disclosure of information remains consistent with the explanation previously published in the original SAVE PIA.

External Sharing and Disclosure

USCIS is expanding the use of the Photo Matching Tool to all SAVE customer agencies. Currently, there are more than 1,000 federal, state, tribal, and local government agencies that use SAVE to receive immigration status information in response to their queries. These customer agencies will now have the option to use the Photo Matching Tool.

USCIS will continue to share and disclose SAVE information externally for law enforcement purposes to respond to federal, state, tribal, and local government agencies immigration status queries. This external sharing and disclosure of information remains consistent with the explanation previously published in the original SAVE PIA.

Notice

This PIA Update provides notice of changes associated with the SAVE Program. Furthermore, USCIS provides notice of these enhancements to SAVE customer agencies through updated user manuals,

¹¹ The CTMS PIA (DHS/USCIS/PIA-022) discusses USCIS Verification Monitoring and Compliance activities in detail. The PIA is available at www.dhs.gov.



SAVE newsletters, training and the SAVE log-in screen. Additionally, the *Federal Register*, Volume 76, No. 102, May 26, 2011, provides notice of the implementation of the electronic G-845.¹²

Additionally, the MOAs between SAVE and customer agencies require the customer agencies to provide notice to the applicants, consistent with notice required by the Privacy Act, that informs applicants about how their information is used; that providing the information is voluntary; and the consequences of not providing the requested information. USCIS Verification Division provides guidance to customer agencies concerning notice to the applicants in the SAVE Program Guide and the agency SAVE Self-Assessment Guide.¹³

Individual Access, Redress, and Correction

There are privacy enhancing changes to the access, redress, and record correction procedures as a result of this PIA Update.

Individual Access:

If SAVE displays an “Institute Additional Verification” message, USCIS requires SAVE customer agencies to notify the applicant that an additional verification is necessary to verify immigration status. At that time, the customer agency employee will verbally notify the individual applicant and allow him or her to complete a G-845. The individual can then review the information submitted and provide additional information. For customer agencies who opt to use the automated G-845, SAVE will automatically generate a SAVE Case Verification Number that is assigned to the automated G-845. Applicants can go to the SAVE Case Check website, which enables applicants to track the resolution status of the G-845 submitted by an agency on their behalf.

SAVE Case Check prompts applicants to input the Case Verification Number. Upon entering the number, the webpage displays that the case is: 1) undergoing review; 2) the case number entered was not found; or 3) resolved. If individuals receive notice that their case was resolved, the website instructs applicants to contact the benefit-granting agency for further information about the case. SAVE Case Check only collects the Case Verification Number and does not display any PII.

Redress and Correction:

If SAVE displays an “Institute Additional Verification” message, the SAVE customer agencies can complete a G-845 with the applicant’s knowledge and consent. SAVE customer agencies can now submit this form electronically. In addition to the electronic G-845, SAVE customer agencies can submit accompanying immigration documents by scanning and uploading the documents directly into the SAVE system. The G-845 provides the applicant with the opportunity to ensure that the information about him or her that is submitted to SAVE for verification purposes is correct so that it can be accurately matched to the information in the SAVE database.

¹² The notice published in the Federal Register is available at: <http://www.gpo.gov/fdsys/pkg/FR-2011-05-26/html/2011-13090.htm>

¹³ The SAVE Self-Assessment Guide is designed to make it easier for customer agencies to monitor their use of SAVE. The guide offers easy-to-follow checklists that will help users establish their own compliance and training programs.



After the customer agency uses the manual verification process, if a photo mismatch remains unresolved, the customer agency will advise the applicant to make an InfoPass appointment. At an InfoPass appointment the applicant visits an IIO at a USCIS District Office to make the correction.

The electronic transmission of the G-845 within SAVE does not expose the same risk as mailing hardcopies of the form and supplemental documents. It is a faster and safer transmission method and reduces the risk that the form could be lost or otherwise compromised in transit.

Additionally, the new inclusion of the DHS Document Number as part of the algorithm to select pictures mitigates the risk of an incorrect photograph displaying. SAVE customer agencies check these numbers against each other to ensure that the photo displayed in SAVE is accurate.

Technical Access and Security

The technical access and security controls for SAVE have not changed. The changes described in this PIA update conform with existing technical access and security safeguards that the previously published SAVE PIA (DHS/USCIS/PIA-006) describes.

Technology

The only change in technology is that the Form G-845 is now electronically integrated into SAVE. This enables customer agencies to enter the required additional information directly into SAVE instead of Status Verifiers entering it manually. Customer agencies can now upload the G-845 and corresponding documents from their hard drives to SAVE DHS/USCIS servers.

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Approval Signature

Original signed and on file with the DHS Privacy Office.

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