



**Privacy Impact Assessment Update
for the
Systematic Alien Verification for Entitlements
Program**

DHS/USCIS/PIA-006(a)

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Abstract

The Department of Homeland Security (DHS), U.S. 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 immigration status prior to the granting of benefits and licenses, as well as for other lawful purposes. The purpose of this update is to: (1) describe the new collection of foreign passport country of issuance (COI) from agencies issuing benefits and from the United States Visitor and Immigrant Status Indicator Technology (US-VISIT) Arrival and Departure Information System (ADIS);¹ (2) describe the addition of Enterprise Citizenship and Immigration Services Centralized Operational Repository (eCISCOR); (3) describe the decommissioning of the Image Storage and Retrieval System (ISRS) and replacement by the Customer Profile Management System (CPMS); and (4) describe the decommissioning of the Reengineered Naturalization Applications Casework System (RNACS) and replacement by Claims Linked Application Information Management System 4 (CLAIMS 4).²

Introduction

USCIS administers the SAVE Program. SAVE is a fee-based inter-governmental initiative designed to help federal, state, tribal, and local government agencies and licensing bureaus confirm immigration status information. USCIS confirms of immigration status to the extent that such the 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, federal, state, tribal, and local customer agencies can request immigration status information in order to make a determination regarding the applicant's eligibility for a benefit or a license. It is important to note that SAVE does not make determinations on an applicant's eligibility for a specific benefit or license, but it does provide the necessary information to the agencies to allow them to make an informed decision prior to issuing benefits or licenses. The customer agency analyzes the SAVE response against the agency's own eligibility criteria to make an award determination. SAVE does not know the final outcome of the benefit adjudication.³

¹ See PIA at DHS/NPPD/USVISIT/PIA-005 Arrival and Departure Information System (ADIS) and updates and SORN at DHS/USVISIT-001 Arrival and Departure Information System 72 Fed. Reg. 47057 (August 22, 2007).

² See PIA at DHS/USCIS/PIA-015 Computer Linked Application Information Management System (CLAIMS4) and updates and SORN at DHS/USCIS-007 Benefits Information System 73 Fed. Reg. 56596 (September 29, 2008).

³ See the original SAVE Program PIA (DHS/USCIS/PIA-006) available at www.dhs.gov/privacy for additional information on the status verification process.

USCIS is updating the SAVE Program PIA dated August 26, 2011, to: (1) describe the new collection and verification of COI from US-VISIT ADIS; (2) describe the SAVE Program's new interface with eCISCOR; and (3) discuss the decommissioning of ISRS and RNACS. The functionality previously provided by ISRS and RNACS will be replaced with CPMS and CLAIMS 4, respectively.

Country of Issuance

SAVE currently uses the I-94 number⁴ as a primary identifier⁵ to determine immigration status for non-immigrants. However, the U.S. Customs and Border Protection (CBP) is in the process of automating the I-94 system to increase efficiency and streamline the admission process for travelers to the United States. However, since SAVE depends on the integrity of the I-94 number and the automation effort is still underway, USCIS has proactively developed a new primary identifier that is independent of the I-94 process. SAVE will now have the capability to determine citizenship status using a combination of foreign passport number and COI. Combining these two data elements makes them a primary identifier. This enhancement requires new collection of COI from benefit applicants by the benefit granting agency. SAVE will compare this information with data in ADIS through an existing system interface. The collection of COI improves the efficiency of the verification process and addresses changes in the admission process for travelers.

The specific changes required to accommodate this initiative are as follows:

- USCIS will update the SAVE interface to enable agencies to enter foreign passport number and COI.
- SAVE will receive COI through the existing ADIS connection.

eCISCOR

In situations where SAVE cannot automatically determine an applicant's immigration status, status verifiers will use eCISCOR⁶ to manually verify the immigration status of benefit applicants. eCISCOR is a read-only database that consolidates immigration and naturalization information from several USCIS data systems. Verifying applicant information in eCISCOR improves the efficiency of status verifiers by allowing them to view data from multiple systems in one centralized repository. Status verifiers will use eCISCOR to verify an applicant's A-Number, name (last, first, middle), DOB, form numbers and Certificate of Citizenship number. The verification process is not changed by the use of eCISCOR.

eCISCOR is a centralized source of data from other USCIS systems. As a result, there is a risk that data in eCISCOR may not accurately reflect the underlying data in the source system. This risk is mitigated through the management and updating of eCISCOR by USCIS. Additionally, status verifiers

⁴ Form I-94 is a DHS form generally issued to aliens at the time they lawfully enter the United States. Form I-94 is used to document status in the United States, the length of stay, and departure.

⁵ A primary identifier is a value that relates to a single person for the purpose of searching a database.

⁶ The PIA for eCISCOR, Enterprise Citizenship and Immigration Services Centralized Operational Repository, is available at www.dhs.gov/privacy.

have the capability to verify data in the source systems that feed eCISCOR if there is a data integrity issue.

ISRS and CPMS

USCIS decommissioned the ISRS subsystem, which provided access to biometric and related biographic information used to verify the identity of registered aliens and to police illegal entry into and residence in the United States. ISRS was a centralized repository of USCIS biometrics data including the photo, pressprint, and signature of applicants who have been issued a Permanent Resident Card or Employment Authorization Document (EAD) (Form I-766). SAVE used ISRS as part of the initial step in the verification process, as outlined in the SAVE PIA.

USCIS continues to view biometric information of all individuals who have been issued a Permanent Resident Card (Form I-551) or an EAD by USCIS. However, with the decommissioning of ISRS, SAVE status verifiers will now use the Customer Profile Management System (CPMS) to manually verify the validity of a benefit seeker's Permanent Resident Card or EAD if SAVE cannot automatically determine an applicant's immigration status. In such cases, a benefit agency submits a Form G-845, Document Verification Request. Form G-845 requires an agency to attach a photocopy of the Permanent Resident Card or EAD that a benefit seeker used for verification. Status verifiers will use CPMS to validate the photograph, signature, receipt number, name (Last, First, Middle), DOB, country of birth, form number, and expiration date of the provided document.

RNACS

USCIS decommissioned the RNACS subsystem which provided case tracking and management capability for naturalization casework. Status verifiers used RNACS and CLAIMS 4 to manually verify Naturalization Certificate information. Prior to the decommissioning of RNACS, USCIS migrated all open Application for Citizenship cases to CLAIMS 4. Status verifier will now use CLAIMS 4 to verify this information.

Reason for the PIA Update

USCIS is updating the SAVE Program PIA dated August 26, 2011 to assess the privacy impacts associated with: (1) the new collection of foreign passport COI from agencies issuing benefits and from US-VISIT ADIS; (2) the addition of eCISCOR; (3) the decommissioning of the ISRS and replacement by CPMS; and (4) the decommissioning of the RNACS.

As a result of this update, the SAVE Program will continue to electronically receive all data it currently obtains from DHS/US-VISIT ADIS and other supporting databases, with the exception of RNACS and ISRS, as those two databases were decommissioned.

The COI remains in line with the original purpose of the program and does not create any significant new privacy risks for affected individuals. The privacy impact for the individual providing the foreign passport COI is minimal, as he may already share the COI with the benefit-granting agency by presenting a foreign passport as part of the application process with the agency. By entering this



information into SAVE, it will increase the accuracy of matching an individual passport number with the correct individual and returning an accurate benefit eligibility determination.

Privacy Impact Analysis

In each of the below sections consider how the system has changed and what impact it has on the below fair information principles. In some cases there may be no changes and indicate as such.

The System and the Information Collected and Stored within the System

SAVE will collect and use COI from ADIS to enhance the verification process. The collection and use of the COI by SAVE will enable the automatic verification of benefit applicants using a foreign passport number. Foreign passport number and COI are electronically accessed in ADIS, an existing system interface, during the verification process.

The creation of a new primary identifier based on foreign passport number and COI could pose a privacy risk if the passport is lost or compromised and used by an unauthorized individual to apply for benefits. All identity documents pose a risk of unauthorized use if lost or compromised. However, USCIS has a monitoring and compliance team that monitors SAVE transactions for fraud, misuse, and abuse. Part of that monitoring includes reviewing transactions to see if certain primary identifiers are being used beyond a typical threshold for benefit applicants.

ADIS is not the original source of COI. As a result, receiving COI from ADIS poses the risk that the data is not accurate. This risk was previously identified in the ADIS PIA (DHS/NPPD/USVISIT/PIA-005(a)). ADIS mitigates this risk by receiving some duplicative PII as an intentional mechanism to ensure the accuracy of the information. This data integrity mechanism helps improve the reliability of the ADIS data.

The decommissioning of RNACS and the migration to CLAIMS 4 does not result in an additional privacy risk, as SAVE already connects to CLAIMS 4. USCIS identified CLAIMS 4 as a source in previous PIAs and USCIS is not receiving any additional information from CLAIMS 4 as a result of this change.

There is no additional privacy risk as a result of switch data sources from ISRS to CPMS. CPMS fully replaced all functionality of ISRS and USCIS will not receive any additional information as a result of this change.

There is no change in storage as a result of this update. USCIS will continue storing and maintaining all transactional data in the Verification Information System (VIS), which is the underlying technology for SAVE. Since there is no change to the storage, the privacy impact has not changed.

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). This update creates no increased privacy impact. SAVE will now use the combination of foreign passport number and COI as a primary identifier to query the immigration status of individuals.



Retention

The National Archives Retention Act (NARA) schedule [N1-566-08-7], approved on June 5, 2008, has not changed. SAVE retains information for 10 years from the date of completion of the verification, unless the records are part of an ongoing law enforcement investigation, in which case records may be retained until completion of the investigation. This period is based on the statute of limitations for most types of misuse or fraud possible using SAVE (under 18 U.S.C. § 3291, the statute of limitations for false statements or misuse regarding passports, citizenship, or naturalization documents). Since retention remains the same, there is no further privacy impact as a result of this update.

Internal Sharing and Disclosure

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. The internal sharing and disclosure of this information remains consistent with the previously published SAVE PIA (DHS/USCIS/PIA-006).

External Sharing and Disclosure

USCIS will continue to share and disclose SAVE information externally for law enforcement purposes and to respond to federal, state, tribal, and local government agencies immigration status queries. The external sharing and disclosure of this information remains consistent with the previously published SAVE PIA (DHS/USCIS/PIA-006).

Notice

This PIA and the reissuing of the DHS/USCIS-004 SAVE Program SORN provide notice to the changes associated with the SAVE Program.

Redress

There are no changes to the access, redress, and corrections procedures identified in the previously published SAVE PIA (DHS/USCIS/PIA-006). This update creates no increased privacy impact.

Technical Access and Security

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



Technology

There are three changes in technology as a result of this update. First, SAVE will discontinue receiving data from ISRS and RNACS. The functionality previously provided by these subsystems will be replaced by CPMS and CLAIMS 4. Second, SAVE will now collect COI from ADIS through an existing system interface. Finally, status verifiers will now access eCISCOR to support the immigration status verification process. These technology changes do not create any new significant privacy impacts.

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