



## PRIVACY THRESHOLD ANALYSIS (PTA)

### SUMMARY INFORMATION

<b>Project, Program, or System Name:</b>	Systematic Alien Verification for Entitlements Program		
<b>Component or Office:</b>	U.S. Citizenship and Immigration Services (USCIS)	<b>Office or Program:</b>	Verification Division
<b>FISMA Name (if applicable):</b>	Verification Information System	<b>FISMA Number (if applicable):</b>	CIS-06285-MAJ-06285
<b>Type of Project or Program:</b>	System	<b>Project or program status:</b>	Operational
<b>Date first developed:</b>	July 7, 2007	<b>Pilot launch date:</b>	N/A
<b>Date of last PTA update</b>	February 7, 2023	<b>Pilot end date:</b>	N/A
<b>ATO Status (if applicable):<sup>2</sup></b>	Complete	<b>Expected ATO/ATP/OA date (if applicable):</b>	Ongoing Authorization

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<sup>2</sup> The DHS OCIO has implemented a streamlined approach to authorizing an Authority to Operate (ATO), allowing for rapid deployment of new IT systems and initiate using the latest technologies as quickly as possible. This approach is used for selected information systems that meet the required eligibility criteria in order to be operational and connect to the network. For more information, see <https://dhsconnect.dhs.gov/org/comp/mgmt/ocio/ciso/Documents/DHS%20ATP%20Guide%20v2.0.pdf#search=atp>.



## SPECIFIC PTA QUESTIONS

### **1. Reason for submitting the PTA: Updated PTA**

The United States Citizenship and Immigration Services submits this updated Privacy Threshold Analysis to document the United States Citizenship and Immigration Services Verification Division and Office of Technology changes to the Systematic Alien Verification for Entitlements Program. The United States Citizenship and Immigration Services administers the Systematic Alien Verification for Entitlements Program, an inter-governmental initiative that provides a web-based service to help federal, state, territorial, tribal and local agencies and other governmental entities verify United States citizenship or immigration status/category information of applicants for benefits, licenses, or other authorized purposes.

This Privacy Threshold Analysis documents that the Systematic Alien Verification for Entitlements Program has

1. Expanded its search capabilities to allow approved Systematic Alien Verification for Entitlements Program user agencies to verify United States citizenship information using Social Security Numbers and other non-Department of Homeland Security enumerators.
2. A new Social Security Administration system connection to support verification of citizenship/immigration status.
3. A new bulk uploader/list processor function that allows user agencies to upload lists of benefit applicants.
4. Use of the Voter Registration and Voter List Maintenance Verification functionality.
5. The collection of information from the Department of State's Consular Consolidated Database/American Citizen Record Query system. Additionally, the Systematic Alien Verification for Entitlements Program will integrate with the Customs and Border Protection TECS (not an acronym) - Travel Documents and Encounter Data system.

### **2025 Updates**

On April 22, 2025, Homeland Security Secretary Kristi Noem, alongside the United States Citizenship and Immigration Services and the Department of Government Efficiency, announced a comprehensive optimization of the Systematic Alien Verification for Entitlements Program to ensure a single, reliable source for verifying immigration status and United States citizenship nationwide. Congressional, federal, and state stakeholders have periodically expressed interest in using the Systematic Alien Verification for Entitlements to verify naturalized and derived citizenship information during voter registration and/or for voter list maintenance. Verification for voter list maintenance purposes often occurs when a state Department of Motor Vehicles compares its records to state voter agency records to determine if individuals on the voter rolls represented that they were other than U.S. citizens when the Department of Motor Vehicles issued their driver's license. The state voter agency then follows up with those individuals as to their citizenship status through state law voter registration challenge procedures. The United States Citizenship and Immigration Services Verification Division is leading this effort and has identified multiple phases to optimize the program. A high-level summary is provided below, while a more detailed description of each phase follows.



- Phase 1: Free Service for State, Local, Tribal, Territory agencies and Bulk Uploader. (Estimated completion: Implemented)
- Phase 2: Integration with the Social Security Administration to allow for full Social Security Number to be used as a non-Department of Homeland Security enumerator. (Estimated completion: Implemented)
- Phase 3: Modify the Security Administration integration to allow for truncated Social Security Numbers (last 4-digits) to be used as a non-Department of Homeland Security enumerator. (Estimated completion: July/August 2025)
- Phase 4: Integration with Customs and Border Protection to enable United States passport data, received from the Department of State, to be used within the Systematic Alien Verification for Entitlements Program. (Estimated completion: To be determined)
- Phase 5: Integration with the Department of Justice to enable an incarceration/felony related flag (the flag will be used internally and will not be sent to the agencies or the applicants). (Estimated completion: To be determined)
- Phase 6: Integration with State Driver's Licensing Agencies to enable a Driver License number to be used as a non-Department of Homeland Security enumerator. (Estimated completion: To be determined)

The summary below focuses on phases one (1) through four (4). More detailed information can be found later in this document. Phases five (5) and six (6) are longer term goals of the optimization effort and are still in the exploratory/planning stage. The United States Citizenship and Immigration Services will update this Privacy Threshold Analysis to support the remaining phases during their development.

### Phases One (1) through Three (3)

Systematic Alien Verification for Entitlements Program eliminated fees for non-federal users creating Systematic Alien Verification for Entitlements Program cases. User agencies can now create multiple individual cases from a list of data provided by the user. Further, the Systematic Alien Verification for Entitlements Program plans to integrate additional immigration information into search functionality and case results, such as timelines and addresses. Improved automatic status updates and a new user-friendly interface will empower federal, state, local, territorial, and tribal agencies to help prevent individuals who are not qualified for government benefits and licenses from receiving those benefits and licenses. The Department of Homeland Security intends to provide ongoing updates to stakeholders as the Systematic Alien Verification for Entitlements Program Optimization Plan progresses. Systematic Alien Verification for Entitlements Program users must attest to completing the Systematic Alien Verification for Entitlements Program tutorial prior to gaining access to Systematic Alien Verification for Entitlements Program. Users' access is based on their permissions.

The United States Citizenship and Immigration Services has developed and implemented a new bulk uploader/list processor feature to the Systematic Alien Verification for Entitlements Program. This feature will allow program users to upload a list (such as an excel spreadsheet) of benefit applicants to the Systematic Alien Verification for Entitlements Program for processing. Once the list is uploaded, the Systematic Alien Verification for Entitlements Program will accept or not accept the data then, through an automated process, create front-end single-record cases for each entry. Initially the creation of cases using this feature is limited to cases created using an A-number, Citizenship or Naturalization Certificate



number, or Social Security number. Agencies will not be prompted to institute additional verification when using this process but are instructed to resubmit additional information when the process is unable to return a response. Expansion of this feature in the future may include the ability to create cases with additional enumerators and the ability to request configured information not automatically selected for the benefit type.

User agencies will be able to access each case created using the list processor feature in the Systematic Alien Verification for Entitlements system as normal, by viewing the individual case status and response. The Systematic Alien Verification for Entitlements Program also has a feature available to all the user agencies to generate a report that will list all the cases created, the status of the case and the Systematic Alien Verification for Entitlements Program response. Access to generate the report, including what cases are included, will vary depending upon the individual user's permission. United States Citizenship and Immigration Services is providing this verification service for all benefit requests. There are approximately 1,200 user agencies with access to the Systematic Alien Verification for Entitlements Program to verify immigration status for benefits or entitlements, and in fiscal year 2024, the Systematic Alien Verification for Entitlements Program completed over 24.5 million first step verifications.

The Systematic Alien Verification for Entitlements Program was originally designed only to use a Department of Homeland Security-issued enumerator (such as an alien number or A-Number) to query immigration records, specifically, to provide immigration status to Systematic Alien Verification for Entitlements Program user agencies. The Systematic Alien Verification for Entitlements Program is now expanding to allow Systematic Alien Verification for Entitlements Program user agencies to provide a Social Security Number or a United States Passport number to query the Systematic Alien Verification for Entitlements Program.

The Systematic Alien Verification for Entitlements Program will also add the ability for user agencies to verify truncated Social Security Numbers (last 4 digits) against Social Security Administration records. This will allow the Systematic Alien Verification for Entitlements Program to verify all United States citizens including those by birth, which was previously not available. A benefit applicant's Social Security number can only be used for automated initial verification and cannot be used for additional verification, which will continue to require a Department of Homeland Security immigration enumerator since the Systematic Alien Verification for Entitlements Program does not normally collect Social Security Numbers or passport numbers. The addition of the Voter Registration and Voter List Maintenance Verification, and the Social Security Administration connection is now live. The Systematic Alien Verification for Entitlements Program can now verify United States-born citizens for voter verification agencies.

The Department of Homeland Security/United States Citizenship and Immigration Services seeks access to Social Security Administration information accessed through the Department of Homeland Security/United States Citizenship and Immigration Services Verification Information System<sup>3</sup>. The United States Citizenship and Immigration Services and the Social Security Administration agreed to the following limitations on the access to, and disclosure and use of information that identifies a verification request as being generated by United States Citizenship and Immigration Services or associated with a United States Citizenship and Immigration Services program:

<sup>3</sup> Verification Information System provides services to customers through Systematic Alien Verification for Entitlements and E-Verify (the latter of which will not be used for this initiative).



- Data or information that identifies a verification request as being generated by United States Citizenship and Immigration Services or associated with a United States Citizenship and Immigration Services program will remain information owned by United States Citizenship and Immigration Services.
- The United States Citizenship and Immigration Services will use the verification responses generated by the Social Security Administration only for the purposes described in the Information Sharing Agreement between the Department of Homeland Security, United States Citizenship and Immigration Services and the Social Security Administration.
- Data or information that identifies a verification request as being generated by the United States Citizenship and Immigration Services or associated with a United States Citizenship and Immigration Services program will be used only as provided in the Information Sharing Agreement by the Social Security Administration.
- Data or information that identifies a verification request as being generated by United States Citizenship and Immigration Services or associated with the United States Citizenship and Immigration Services program provided by Social Security Administration will not be duplicated or disseminated outside Social Security Administration without prior written approval from United States Citizenship and Immigration Services. The United States Citizenship and Immigration Services will not give such approval unless the redisclosure is required by law or is essential to the conduct of the exchange. In such cases, the Social Security Administration, the agency redisclosing the records, must specify in writing what records will be redisclosed, to whom they will be redisclosed, and the reasons that justify redisclosure.
- The United States Citizenship and Immigration Services will not duplicate or disseminate the verification responses for a purpose not covered by the Information Sharing Agreement, within or outside of its agency, without the written permission of the Social Security Administration excepted as required by Federal law. The Social Security Administration will not give such permission, unless Federal law requires disclosure, or disclosure is essential to the purpose of this Agreement. For such permission, The United States Citizenship and Immigration Services must specify in writing what data it is requesting to duplicate or disseminate and to whom, and the reasons that justify such duplication or dissemination.

### **Administrative Safeguards**

The Social Security Administration and the United States Citizenship and Immigration Services will restrict access to the data matched and to any data created by the match to only those users, for example, employees and contractors, who need it to perform their official duties in connection with the uses of the data authorized in the Information Sharing agreement. Further, the Social Security Administration and the United States Citizenship and Immigration Services will advise all personnel with access about the confidential nature of the data, the safeguards required to protect the data, and the civil and criminal sanctions for noncompliance contained in the applicable Federal laws.

Parties, including all personnel with access to information, will be appropriately educated and trained regarding the proper handling of personally identifiable information and proper care of the information systems to ensure the overall safeguarding and security of the information. The Social Security Administration and the United States Citizenship and Immigration Services will ensure that its



employees, including contractors with the access to any of the information, have completed privacy training on the handling of personally identifiable information.

#### Phase Four (4)

The United States Citizenship and Immigration Services will need to query other non-United States Citizenship and Immigration Services systems, besides the Social Security Administration's Numident system, with the information provided by the Systematic Alien Verification for Entitlements Program user agency to find the appropriate Department of Homeland Security-issued enumerator to continue with the Systematic Alien Verification for Entitlements Program case processing. For instance, USCIS is researching the possibility of using a United States Passport Number to be able to identify a Department of Homeland Security-issued enumerator. In a case when a User Agency uploads or enters a United States Passport Number instead of a DHS-issued enumerator, the Systematic Alien Verification for Entitlements Program will query another non-United States Citizenship and Immigration Services System using the United States Passport Number along with a unique identifier to find any records and will identify if a Department of Homeland Security-issued enumerator was used by the applicant when applying for a Department of Homeland Security-issued benefit or if a Passport Number was used at a United States Port of Entry and is associated with a Department of Homeland Security-issued enumerator. In this instance, to enable this change, the Systematic Alien Verification for Entitlements Program would integrate with the Customs and Border Protection TECS (not an acronym) - Travel Documents and Encounter Data to match a Passport Number against Customs and Border Protection and Department of State records to attempt to locate a Department of Homeland Security issued enumerator.

The TECS (not an acronym) - Travel Documents and Encounter Data stores travel document information (scanned images of documents, biographic information, document details, and photographs) from the United States Citizenship and Immigration Services Lawful Permanent Resident Cards along with Department of State-issued United States passports, visas, foreign passports, enhanced driver's licenses, and enhanced tribal cards. The TECS (not an acronym) - Travel Documents and Encounter Data USPassportRESTService allows interconnected systems to query TECS (not an acronym) - Travel Documents and Encounter Data for United States passport information. For this use case, the Systematic Alien Verification for Entitlements Program user agency will input a passport number into the Systematic Alien Verification for Entitlements Program. The query will trigger the USPassportRESTService to locate the matching United States passport number and return the results to the user. This will allow the Systematic Alien Verification for Entitlements Program to verify all types of United States citizens, including those by birth, which was previously not available. Currently, the Systematic Alien Verification for Entitlements Program only collects passport numbers for foreign issued passports if it is provided with an additional Department of Homeland Security enumerator. The United States Citizenship and Immigration Services E-Verify has an existing connection to the USPassportRESTService, which also resides within the Verification Information System, like Systematic Alien Verification for Entitlements Program.

The following are updates that were planned prior to Secretary Noem's vision for optimizing the Systematic Alien Verification for Entitlements Program and are still in progress.



- Systematic Alien Verification for Entitlements Program will update the responses provided to users as part of the Interface Control Agreement Version 38, which enhances the Systematic Alien Verification for Entitlements Program query logic to provide more accurate information based on the need to know. The Systematic Alien Verification for Entitlements Program will add the collection of an uploaded document such as a Naturalization/Citizenship Certificate Number, when the user submits a second step additional verification, as well as the collection of a reason code, which allows the Systematic Alien Verification for Entitlements Program users to provide additional details regarding the applicant's request, particularly during the additional verification process. The Systematic Alien Verification Entitlements responds to users by providing an immigration status/category or United States citizenship. These additional collections will help Systematic Alien Verification for Entitlements Program identify and remedy data issues, reduce overall manual response times, and allow the Systematic Alien Verification for Entitlements Program to improve the quality of first step automated responses.
- A live site environment will be implemented where Systematic Alien Verification for Entitlements web service users can access new and current interface control agreements. This will streamline the process to update the interface control agreements and ensure that the Systematic Alien Verification for Entitlements Program users have access to the most current information for the Interface Control Agreement Version 38.
- The Systematic Alien Verification for Entitlements Program case response screen will be redesigned so that it is easier to read and allow for the additional information to be submitted. The screen will be packaged in a new way to provide the user clear information during the initial verification.

Additionally, Systematic Alien Verification for Entitlements Program will be collecting information from the Department of State's Consular Consolidated Database / American Citizen Record Query system which is a consular search engine used by the Department of State to manage and access records related to United States citizens, particularly for consular protection and services, including managing passport requests and applications.

## **2024 Update**

As part of the Systematic Alien Verification for Entitlements Program's normal review process, the United States Citizenship and Immigration Services intends to access the Department of State's Consular Consolidated Database / American Citizen Record Query system to verify immigration status of applicants for benefits, licenses, and other authorized purposes. The purpose of collecting this information is to confirm the identity of the applicant to determine their status. This process is part of an ongoing effort that began in 2024.

## **Background**

The Systematic Alien Verification for Entitlements Program is an online service for registered federal, state, territorial, tribal, and local government agencies to verify immigration status and United States citizenship of applicants seeking benefits or licenses. Systematic Alien Verification for Entitlements



Program is not a database but queries Department of Homeland Security-accessed federal records to provide registered user agencies with a verification response.

In 1986, Congress mandated that the Immigration and Naturalization Service, now United States Citizenship and Immigration Services, establish a system to verify the citizenship and immigration status of individuals seeking government benefits and licenses.

The United States Citizenship and Immigration Services Verification Division administers the Systematic Alien Verification for Entitlements Program, which is an intergovernmental initiative using a web-based service to help federal, state, territorial, tribal and local benefit-issuing and licensing agencies and other governmental entities determine the immigration status or United States citizenship of applicants for public benefits, licenses, grants, credentials, background investigations, and other lawful purposes, so only entitled applicants receive them. Systematic Alien Verification for Entitlements Program verifies immigration status/category and United States citizenship against Department of Homeland Security-accessed records. Historically, the Systematic Alien Verification for Entitlements Program has not verified information for United States born citizens as a Department of Homeland Security immigration enumerator was previously required, but now the Systematic Alien Verification for Entitlements Program can verify United States-born United States citizens against Social Security Administration data. The Systematic Alien Verification for Entitlements Program does not determine an applicant's eligibility for a specific benefit or license, as this is the responsibility of the benefit/license granting agency.

As of April 1, 2025, the Systematic Alien Verification for Entitlements Program has revised its transaction charges for all state, local, tribal, and territorial government agencies using the Systematic Alien Verification for Entitlements Program to eliminate those charges. Federal agencies are still charged a fee to use the Systematic Alien Verification for Entitlements Program. The authority for the Systematic Alien Verification for Entitlements Program, and for particular Systematic Alien Verification for Entitlements Program authorized uses can be found in the Immigration Reform and Control Act<sup>4</sup>; the Personal Responsibility and Work Opportunity Reconciliation Act<sup>5</sup> Title IV, Subtitle A, of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996<sup>6</sup>, and the REAL ID Act of 2005<sup>7</sup>, the Patient Protection and Affordable Care Act of 2010,<sup>8</sup> and the Federal Aviation Administration Extension, Safety and Security Act of 2016.<sup>9</sup> In addition, the Systematic Alien Verification for Entitlements Program has an obligation under 8 U.S.C. 1373(c) to "respond to an inquiry by a Federal, State or local government agency, seeking to verify or ascertain the citizenship or immigration status of any individual within the jurisdiction of the agency for any purpose authorized by law, by providing the requested verification or status information."

<sup>4</sup> Immigration Reform and Control Act of 1986, Public Law No. 99-603

<sup>5</sup> Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Public Law No. 104-193, 110 Statute 2168

<sup>6</sup> Title IV, Subtitle A, of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 Public Law 104-208, 110 Statute 3009

<sup>7</sup> REAL ID Act of 2005, Public Law No.109-13, 119 Statute 231

<sup>8</sup> Patient Protection and Affordable Care Act of 2010, Public Law No. 111-148

<sup>9</sup> Federal Aviation Administration Extension, Safety and Security Act of 2016 (Federal Aviation Administration Act), Public Law No. 114-190 § 3405(d) (July 15, 2016).



The United States Citizenship and Immigration Services Verification Division operates the Verification Data Information System as the search engine for Systematic Alien Verification for Entitlements Program and the E-Verify Program. The Verification Data Information System accesses nationally accessible databases of selected immigration records to support both the Systematic Alien Verification for Entitlements Program and the E-Verify Program. The Systematic Alien Verification for Entitlements Program queries an individual's immigration status to help the administering agency determine eligibility for any public benefit, license, or credential based on their United States citizenship or immigration status. The United States Citizenship and Immigration Services is obligated by law to respond to an inquiry by a Federal, state or local government agency, seeking to verify or ascertain the citizenship or immigration status of any individual within the jurisdiction of the agency for any purpose authorized by law, by providing the requested verification or status information.

### **Systematic Alien Verification for Entitlements Program**

The United States Citizenship and Immigration Services administers the Systematic Alien Verification for Entitlements Program, an inter-governmental initiative that provides a web-based service to help federal, state, territorial, tribal, and local benefits-issuing and licensing agencies and other governmental entities along with Airport Operators verify the United States citizenship and immigration status/category information of applicants for public benefits or licenses (hereinafter "benefits"). Examples of these benefits include Supplemental Security Income Supplemental Nutrition Assistance Program (formerly food stamps), Temporary Assistance for Needy Families cash assistance, Medicaid, Children's Health Insurance Program, REAL ID compliance, and other statutorily authorized purposes, including voter verification.

The Systematic Alien Verification for Entitlements Program also eliminates fees for database searches, breaks down silos for more accurate results, streamlines List Processor submission, and integrates additional immigration information, such as timelines and addresses. Automatic status updates and a new user-friendly interface will empower Federal, state, local, territorial, and tribal agencies to help prevent individuals who are not qualified for government benefits from receiving those benefits. The Department of Homeland Security intends to provide ongoing updates to stakeholders as the Systematic Alien Verification for Entitlements Program Optimization Plan progresses.

Agency use of the Systematic Alien Verification for Entitlements Program is administered by the Verification Division. All user agencies are required to register with the Systematic Alien Verification for Entitlements Program to access the system prior to using the Systematic Alien Verification for Entitlements Program. The Systematic Alien Verification for Entitlements Program is not a source system and connects with federal immigration systems, and now the Social Security Administration's Numident<sup>10</sup> system, to access applicable information. The Systematic Alien Verification for Entitlements Program also has a Case Status Check capability that allows benefit applicants to view the status of their Systematic Alien Verification for Entitlements Program case. The system provides benefit eligibility checks based on the grant dates. The Verification Division has a three (3) tier process when verifying an individual's immigration status or United States citizenship.

<sup>10</sup> NUMIDENT or "Numerical Identification" refers to the master file of Social Security Administration records containing information about individuals who have applied for or been assigned a Social Security Number. This file includes records for applications, claims, and death records related to individuals with a Social Security Number.



Users must perform all additional verification procedures the Systematic Alien Verification for Entitlements Program requires and/or the applicant requests prior to denying a benefit based upon a Systematic Alien Verification for Entitlements Program response. Users must provide all applicants who are denied benefits based solely or in part upon the Systematic Alien Verification for Entitlements Program response adequate written notice and the information necessary to contact the Department of Homeland Security so that applicants may correct their immigration records in a timely manner, if necessary.

### **Initial verification**

A Systematic Alien Verification for Entitlements Program user agency accesses their account in the system and either submits requests individually or via a bulk request using the system's new bulk uploader feature. When a Systematic Alien Verification for Entitlements Program user agency submits an online verification request for a benefit applicant, it provides several required identifiers for the benefit applicant from documents presented by the benefit applicant, including first and last name, date of birth, and at least one of the following: an enumerator from the Department of Homeland Security (e.g. Alien number/United States Citizenship and Immigration Services number, Form I-94 Number, Card Number/I-797 Receipt number, Citizenship/Naturalization Certificate Numbers), a Social Security number from Social Security Administration, or a United States passport number from the Department of State. Social Security Numbers and United States passport numbers are new enumerators. Previously, enumerators were solely limited to Department of Homeland Security-issued immigration enumerators.

In the case of a bulk upload the Systematic Alien Verification for Entitlements Program will use an automated process to create individual cases for each benefit applicant on the list.

Using these data fields, the Systematic Alien Verification for Entitlements Program performs an automated query of various Systematic Alien Verification for Entitlements Program-accessed federal databases for relevant records. If a Social Security Number is submitted under this new collection, the Systematic Alien Verification for Entitlements Program will verify this enumerator against the Social Security Administration records, including the Social Security Administration death records and citizenship records. If the individual's Social Security account has a record of an A-number or certificate number, the Social Security Administration will provide that information to the Systematic Alien Verification for Entitlements Program, which will be used to validate that information against the Department of Homeland Security records. If a United States passport number is submitted, the Systematic Alien Verification for Entitlements Program will verify it against the Department of State related records available in the Customs and Border Protection TECS (not an acronym) - Travel Documents and Encounter Data system. When the Systematic Alien Verification for Entitlements Program locates a record pertaining to the benefit applicant in any of these federal databases, the Systematic Alien Verification for Entitlements Program displays a verification response to the user agency within seconds.

### **Second step, additional verification (Tier 2)**



If the Systematic Alien Verification for Entitlements Program is unable to find a record pertaining to the benefit applicant through the automated first level search of the Department of Homeland Security records, including United States passport records and the Social Security Administration records, it displays a response to the user indicating additional action is required from the user agency, including requesting additional verification when an immigration enumerator is available. If only a Social Security Number is submitted for verification, the user agency will be informed to close the case and submit a new request using either corrected data or an immigration enumerator, since additional verification cannot be conducted with only a Social Security Number.

The Systematic Alien Verification for Entitlements Program user agency may start the additional verification procedure, which may include is an in-depth manual review by Systematic Alien Verification for Entitlements Program staff (Status Verification Analyst) to determine the applicant's immigration status or United States citizenship. At the point at which the "Institute Additional Verification" message is displayed, user agencies must submit the case for additional verification if they are relying on a Systematic Alien Verification for Entitlements Program response to deny a benefit. Additionally, if the user agency receives a response and they have questions about the validity of the response, the user agency may submit a case that already received a Systematic Alien Verification for Entitlements Program response for additional verification. Users must also submit a case for additional verification when requested by the applicant.

User agencies may not rely on a Systematic Alien Verification for Entitlements Program response to approve or deny an application for benefits unless they have followed all required Systematic Alien Verification for Entitlements Program verification procedures. The Systematic Alien Verification for Entitlements Program users are not required to institute additional verification if a user agency has alternate grounds upon which to base its decision to decide a benefit that do not require verification of the applicant's immigration status/category, even where the agency is prompted to do so. Examples of when a user agency has alternate grounds to base a decision that does not require the completion of additional verification include:

- The applicant does not meet eligibility requirements for the benefit unrelated to immigration status/United States citizenship.
- The applicant withdraws their application.
- The applicant cannot be contacted/fails to respond to an agency's request for follow-up.
- The applicant presents documentation the Systematic Alien Verification for Entitlements Program cannot verify (such as a military identification).

This revision adds the collection of an uploaded document which includes immigration enumerators (such as a Form I-94, Arrival/Departure Records, Naturalization/Citizenship Certificate, or passport records) when a case is submitted for second step additional verification as well as a reason code. Reason codes can provide information on why the initial verification was not successful, if the case has been escalated for additional verification, or suggest that additional verification steps may be needed to determine the applicant's status or eligibility for a benefit. Reason codes can also identify if it was a user-initiated additional verification request when the user received an initial Systematic Alien Verification for Entitlements Program response providing an immigration status/category or United States citizenship. These additional collections will help the Systematic Alien Verification for Entitlements Program identify



and remedy data issues, reduce overall manual response times, and allow the Systematic Alien Verification for Entitlements Program to improve the quality of first step automated responses.

If the second step manual search produces relevant information enabling the verification of immigration status, the Systematic Alien Verification for Entitlements Program provides an electronic response to the inquiring user agency.

If the user agency declines second step additional verification, the verification process ceases. Additional screens notify the user agency that closing the case without performing additional verification means the agency does not have a complete Systematic Alien Verification for Entitlements Program response. The Systematic Alien Verification for Entitlements Program user agencies cannot rely upon an incomplete Systematic Alien Verification for Entitlements Program response to deny a benefit.

### **Third step Additional Verification with Documents (Tier 3)**

If a benefit applicant's immigration status/category cannot be verified on initial or additional verification step when submitting a Department of Homeland Security enumerator, the system will prompt the user agency to resubmit the case with documents. When the prompt is received, the agency must upload a copy of the front and back of the immigration document the applicant presented to the user agency for the Systematic Alien Verification for Entitlements Program to perform detailed manual research at third step. A Department of Homeland Security immigration enumerator is required for the third step additional verification. The Systematic Alien Verification for Entitlements Program cannot complete third step additional verification using non-immigration documentation. The Systematic Alien Verification for Entitlements Program user agencies are legally authorized to make electronic copies of immigration documents for purposes of verifying immigration status. Cases created with just the Social Security Number or a Passport Number as the enumerator are not subject to this step.

If the third step manual review produces relevant information enabling the verification of immigration status/category or United States citizenship, the Systematic Alien Verification for Entitlements Program provides an electronic response to the user agency.

If a benefit applicant's immigration status/category is not verified after completing third step verification, the Systematic Alien Verification for Entitlements Program will provide additional information or guidance on how to proceed.

If the applicant believes their information in the Department of Homeland Security records is incorrect, the applicant can seek a records correction. User agencies should provide the Systematic Alien Verification for Entitlements Program Fact Sheet and Systematic Alien Verification for Entitlements Program Records: Fast Facts for Benefit Applicants<sup>11</sup> to benefit applicants that may require records correction.

<sup>11</sup> The Systematic Alien Verification for Entitlements Fact Sheet and Systematic Alien Verification for Entitlements Records: Fast Fact for Benefits Applicants is accessible at <https://www.uscis.gov/save/benefit-and-license-applicants/resources-for-benefit-and-license-applicants>



The Systematic Alien Verification for Entitlements Program user agency continues to have the option of running a web report within the system that will create a file in Adobe format of all cases processed for their organization. The United States Citizenship and Immigration Services provides access to relevant reports of approved or pending cases for Systematic Alien Verification for Entitlements Program user agencies to assist them in managing their Systematic Alien Verification for Entitlements Program cases and monitoring their own compliance with the Systematic Alien Verification for Entitlements Program rules and the federal deeming and reimbursement rules. User agencies can run case-specific reports for quality assurance that will include information, such as name, date of birth, type of benefit, immigration identifier (e.g., A-Number, unexpired foreign passport number, I-94 Arrival/Departure Record), and immigration status, only if the benefit was administered.

### **Voter Registration and Voter List Maintenance Verification**

The Illegal Immigration Reform and Immigrant Responsibility Act of 1996 expanded the Systematic Alien Verification for Entitlements Program by requiring the program to respond to inquiries by federal, state and local government agencies seeking to verify or determine the citizenship or immigration status of any individual within the jurisdiction of the agency for any lawful purpose. See 8 U.S.C. § 1373(c). This authority allows agencies to use the Systematic Alien Verification for Entitlements Program for verification of citizenship and immigration status outside of the traditional benefit-granting programs covered by the Immigration Reform and Control Act of 1986. This includes voter registration and voter list maintenance purposes, so long as the agency meets the legal requirements for using the Systematic Alien Verification for Entitlements Program and provides the required applicant information, when submitting verification requests.

On January 20, 2025, and March 25, 2025, the President issued Executive Orders 14159, *Protecting the American People Against Invasion*<sup>12</sup> and 14248, *Preserving and Protecting the Integrity of American Elections*<sup>13</sup> respectively. Executive Order 14159 requires the Secretary to “promptly issue guidance to ensure maximum compliance by [Department of Homeland Security] personnel with the provisions of 8 U.S.C. 1373<sup>14</sup> and 8 U.S.C. 1644<sup>15</sup> and ensure that State and local governments are provided with the information necessary to fulfill law enforcement, citizenship, or immigration status verification requirements authorized by law.” Executive Order 14248<sup>16</sup> provides, “Federal laws, such as the National Voter Registration Act (Pub. L. 103-31) and the Help America Vote Act (Pub. L. 107-252), require States to maintain an accurate and current Statewide list of every legally registered voter in the State. Pursuant to the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, Department of Homeland Security/United States Citizenship and Immigration Services is required to share database information with States upon request so they can fulfill this duty. 8 U.S.C. 1373(c)<sup>17</sup>.” Executive Order 14159<sup>18</sup> directs the Secretary to “ensure that State and local officials have, without the requirement of the payment

<sup>12</sup> <https://www.federalregister.gov/documents/2025/01/29/2025-02006/protecting-the-american-people-against-invasion>

<sup>13</sup> <https://www.federalregister.gov/documents/2025/03/28/2025-05523/preserving-and-protecting-the-integrity-of-american-elections>

<sup>14</sup> 8 USC 1373 Communication between government agencies and the Immigration and Naturalization Service

<sup>15</sup> 8 USC 1644 Communication between State and local government agencies and Immigration and Naturalization Service

<sup>16</sup> Executive Order 14248 Preserving and Protecting the Integrity of American Elections

<sup>17</sup> 8 USC. 1373(c) Obligation to respond to inquiries

<sup>18</sup> Executive Order 14159 Protecting the American People Against Invasion



of a fee, access to appropriate systems for verifying the citizenship or immigration status of individuals registering to vote or who are already registered.” The Secretary is also required under Executive Order 14159, in coordination with the Department of Government Efficiency Administrator, to review each State’s publicly available voter registration list and available records concerning voter list maintenance activities as required by 52 U.S.C. 20507<sup>19</sup>, alongside Federal immigration databases and State records requested, including through subpoena where necessary and authorized by law, for consistency with Federal requirements. To support this activity the Attorney General is required to prioritize enforcement of 18 U.S.C. 611<sup>20</sup> and 1015(f)<sup>21</sup> and similar laws that restrict aliens from registering to vote or voting, including through use of: (i) databases or information maintained by the Department of Homeland Security; (ii) State-issued identification records and driver license databases; and (iii) similar records relating to citizenship.

In accordance with federal statutes and policies, the Department of Homeland Security personnel must, in a timely manner, provide verification or immigration status information in response to inquiries from State and local government agencies to verify or ascertain the citizenship or immigration status of individuals. As required by 8 U.S.C. 1373(c), such inquiries must relate to individuals within the jurisdiction of the State or local government agency and must be for a purpose authorized by law. Department of Homeland Security personnel have been directed to comply, to the maximum extent possible and permissible under law, with Section 1373, considering federal statutory requirements, including the Privacy Act of 1974, 5 U.S.C. 552a<sup>22</sup>, and 8 U.S.C. 1367<sup>23</sup> (special protected class information); as well as other laws, rules, regulations, policies, and requirements regarding verification, information sharing, and confidentiality.

The Systematic Alien Verification for Entitlements Program user agency registration process determines whether a state voter registration agency meets the legal requirements for using the Systematic Alien Verification for Entitlements Program. As part of registering to use Systematic Alien Verification for Entitlements Program, the agency must provide the Systematic Alien Verification for Entitlements Program all applicable legal authorities and voter registration procedures that authorize the agency to engage in voter registration and/or voter list maintenance activities and verify citizenship status before making individual determinations regarding eligibility for voter registration. The United States Citizenship and Immigration Services provides information on its public facing website to assist user agencies understand the above referenced requirements.<sup>24</sup>

### **Current Process - Voter Registration and Voter List Maintenance Verification**

<sup>19</sup> 52 USC 20507 Requirements with respect to administration of voter registration

<sup>20</sup> 18 USC 611 Voting by aliens

<sup>21</sup> 18 USC 1015 (f) Naturalization, citizenship or alien registry, whoever knowingly makes any false statement or claims that he is a citizen of the United States in order to register to vote or to vote in any Federal, State, or local election (including an initiative, recall, or referendum)-Shall be fined under this title or imprisoned not more than five years, or both

<sup>22</sup> 5 USC 552a Records maintained on individuals

<sup>23</sup> 8 USC 1367 Penalties for disclosure of information

<sup>24</sup> The Systematic Alien Verification for Entitlements Voter Registration and Voter List Maintenance Fact Sheet is accessible at <https://www.uscis.gov/save/resources/voter-registration-and-voter-list-maintenance-fact-sheet>.



In understanding the use of the Systematic Alien Verification for Entitlements Program for voter verification-related purposes (voter registration and voter list maintenance), one should also bear in mind the following limitations and considerations:

- The information needed to verify an individual through the Systematic Alien Verification for Entitlements Program is typically not collected on a voter registration application, although it may be available from other sources, especially driver's license applications.
- The Systematic Alien Verification for Entitlements Program previously was only able to verify United States citizenship for naturalized and certain acquired citizens<sup>25</sup> for whom the United States Citizenship and Immigration Services has a record of their citizenship.
- The Systematic Alien Verification for Entitlements Program previously was often unable to verify acquired United States citizens because eligible individuals frequently do not apply for and thus do not receive a determination and certificate of United States citizenship from the United States Citizenship and Immigration Services.
- Department of State adjudicates acquired citizens that may not have a record with the United States Citizenship and Immigration Services via the issuance of U.S. passports. Therefore, obtaining passport information from the Department of State is in progress.
- The Department of State maintains records for individuals who have renounced their citizenship. Once a Certificate of Loss of Nationality is approved by the Department of State indicating the official determination of loss of United States nationality, this information is shared with the United States Citizenship and Immigration Services per 8 USC 1373.<sup>26</sup>
- With the newly established connection to the Social Security Administration's Numident system, the Systematic Alien Verification for Entitlements Program is now able to verify more United States citizens, including United States citizens by birth, when a Social Security Number is provided.

Verification for voter list maintenance purposes often occurs when a state Department of Motor Vehicles compares its records to the state voter agency records to determine if any individuals on the voter rolls identified that they were non-United States citizens when the Department of Motor Vehicles issued their driver's license. The state voter agency would then follow up with those individuals their citizenship status through established state law voter registration challenge procedures. As part of the established voter registration challenge procedures, the State Voter Agency will seek to establish the immigration/citizenship status of the individuals and use Systematic Alien Verification for Entitlements Program as one method to verify the information.

There are likely some situations in which the Systematic Alien Verification for Entitlements Program provides an initial response indicating a non-United States citizen immigration status (e.g., Lawful Permanent Resident) when the registrant is in fact a United States citizen. However, as also noted above, rules for using the Systematic Alien Verification for Entitlements Program prohibit voter registration agencies from relying upon this initial verification response to deny or revoke registration since as by

<sup>25</sup> "Acquired citizenship" refers to U.S. citizenship conveyed to children through the naturalization of parents or, under certain circumstances, at birth to foreign-born children of U.S. citizens, provided certain conditions are met.

<sup>26</sup> 8 USC 1873 outlines the Communication between government agencies and the Immigration and Naturalization Service.



asserting United States citizenship as part of registering to vote, registrants inherently disagree with any initial response indicating they are not a United States citizen.

**Shortfalls in data accuracy in the system could cause incomplete or false results.**

According to Systematic Alien Verification for Entitlements Program subject matter experts, the situations in which the Systematic Alien Verification for Entitlements Program provides an initial non-United States citizen immigration status for a United States citizen who has a certificate of naturalization or citizenship from the United States Citizenship and Immigration Services, or legacy Immigration and Naturalization Service can happen for a variety of reasons. In some instances, the initial non-United States citizen response is due to the lack of an electronic record with the Social Security Administration showing United States citizenship (which was not reliably recorded pre-1981), or the lack of an electronic record of a United States Citizenship and Immigration Services naturalization or acquired citizenship certificate, which is more likely for older certificates issued before recording them in electronic systems became a consistent practice. In addition, although the electronic record-matching algorithms in the United States Citizenship and Immigration Services Person Centric Service that the Systematic Alien Verification for Entitlements Program uses are very good, the United States Citizenship and Immigration Services previously identified and subsequently fixed two algorithm issues that caused Systematic Alien Verification for Entitlements Program to provide an initial verification response of Lawful Permanent Resident for some naturalized citizens and a small number of acquired United States citizens. But again, many of the safeguards noted above are designed to address any imperfections in records and algorithms used to match them.

The delay between the issuance a Certificate of Naturalization during a naturalization ceremony and when the certificate is reflected in source systems and made available to the Systematic Alien Verification for Entitlements Program rarely, if ever, causes the Systematic Alien Verification for Entitlements Program to provide an initial response of non-United States citizen immigration status. It typically takes about one business day plus a few hours for an electronic record of the certificate to be available to the Systematic Alien Verification for Entitlements Program once it is input by the responsible United States Citizenship and Immigration Services office. The Systematic Alien Verification for Entitlements Program rarely, if ever, receives requests to verify United States citizenship during this time.

Additionally, the United States Citizenship and Immigration Services is not the source agency for Social Security Administration related information. While the United States Citizenship and Immigration Services assumes the accuracy of the Social Security Administration data, it cannot verify accuracy of the information and relies on the Social Security Administration to ensure the data accuracy, timeliness, and integrity of their own data.

**Customs and Border Protection Integration**

The Systematic Alien Verification for Entitlements Program will integrate with the Customs and Border Protection TECS (not an acronym) - Travel Documents and Encounter Data. Customs and Border Protection is now permitting the Systematic Alien Verification for Entitlements Program to query TECS (not an acronym) Travel Documents and Encounter Data system to find a match to US passport information in Customs and Border Protection holdings. The TECS (not an acronym) - Travel Documents and Encounter Data system stores travel document information (i.e. scanned images of documents, biographic information, document details, and photographs) from the United States Citizenship and Immigration Services Lawful Permanent Resident Cards, Department of State-issued United States



passports and visas, foreign passports, enhanced driver's licenses, and enhanced tribal cards. The TECS (not an acronym) - Travel Documents and Encounter Data USPassportRESTService allows interconnected systems to query TECS (not an acronym) - Travel Documents and Encounter Data for United States passport information. For this use case, the Systematic Alien Verification for Entitlements Program user agencies will input a United States passport number into the Systematic Alien Verification for Entitlements Program system.

The query will trigger the USPassportRESTService to locate the matching United States passport number and return the results to the user. This will allow the Systematic Alien Verification for Entitlements Program to verify all types of United States citizens, including those by birth, which was previously not available. Currently, the United States Citizenship and Immigration Services E-Verify Program has an existing connection to the USPassportRESTService, which also resides within the Verification Information System, like the Systematic Alien Verification for Entitlements Program.

Customs and Border Protection has the authority to collect passport photos pursuant to 5 USC 552a (4).<sup>27</sup> Customs and Border Protection receives a routine feed from the Department of State with US passports as they are issued and/or updated. Customs and Border Protection also collects passport information primarily on all travelers seeking to enter the United States at ports of entry. Customs and Border Protection uses this information as part of Agency operations.

### **Social Security Administration Data Sharing**

The Information Sharing Agreement between the Department of Homeland Security-United States Citizenship and Immigration Services and the Social Security Administration documents the Social Security Administration's support by matching data submitted through the Systematic Alien Verification for Entitlements Program to Social Security Administration records in the Social Security Administration's master files of Social Security Number holders and Social Security Number Applications. The United States Citizenship and Immigration Services will only submit verification requests to the Social Security Administration for authorized purposes.

The United States Citizenship and Immigration Services Verification Division and Social Security Administration connection is now live and now connects the Systematic Alien Verification for Entitlements Program with the Social Security Administration's Numident system. Prior to the connection, the United States Citizenship and Immigration Services and Social Security Administration executed a Letter of Agreement that identifies the authorities for both organizations as well as purposes and the data exchange. The United States Citizenship and Immigration Services will document this sharing in a separate Privacy Threshold Analysis.

The Systematic Alien Verification for Entitlements Program performs an automated query of various Systematic Alien Verification for Entitlements Program-accessed federal databases for relevant records. Now, if a Social Security Number is submitted by a user agency, the Systematic Alien Verification for Entitlements Program will verify this enumerator against the Social Security Administration Numident system including the death and citizenship records. If the individual's Social Security account has a record of an A-number or certificate number, the Social Security Administration will provide that information to the Systematic Alien Verification for Entitlements Program, which will in turn be used to

<sup>27</sup> 5 USC 552a (4) Records maintained on individuals - collection, or grouping of information about an individual that is maintained by an agency, including, but not limited to, his education, financial transactions, medical history, and criminal or employment history and that contains his name, or the identifying number, symbol, or other identifying particular assigned to the individual, such as a finger or voice print or a photograph.



validate the information against the Department of Homeland Security records. Verifying citizenship status using Social Security Administration data will be made available to all Systematic Alien Verification for Entitlements Program user agencies.

**Department of State Data Sharing**

If a United States passport number is submitted, the Systematic Alien Verification for Entitlements Program will verify it against information from Department of State-issued passports maintained by the Custom Boarder Protection. Additionally, Systematic Alien Verification for Entitlements Program will collect information from the Department of State’s Consular Consolidated Database / American Citizen Record Query system, which is a consular search engine used by the Department of State to manage and access records related to United States citizens, particularly for consular protection and services, including managing passport requests and applications.

Department of Homeland Security-Department of State Memorandum of Agreement Appendix A allows this query of passport information to be used in Customs and Border Protection TECS (not an acronym) - Travel Documents and Encounter Data to support its missions, including but not limited to verification of United States passports, whenever the document is presented as proof of identity to obtain a benefit, privilege, status, or credential from the Department of Homeland Security, for vetting and screening purposes, and/or for transportation security, national security, law enforcement, border security (including biometric entry and exit initiatives), immigration (including verification purposes such as E-Verify) and counterterrorism purposes.

**User Agencies Memoranda of Agreement**

All user agency memorandums of agreements contain similar provisions to protect the due process and other rights of individuals for whom states or other user agencies submit verification requests to the Systematic Alien Verification for Entitlements Program<sup>28</sup>. The United States Citizenship and Immigration Services has an online tool that allows the public to search if a federal, state, local, tribal, or territorial agency is registered with the Systematic Alien Verification for Entitlement Program.<sup>29</sup>

**2. From whom does the Project, Program, or System collect, maintain, use, or disseminate information?**

*Please check all that apply.*

This project does not collect, collect, maintain, use, or disseminate any personally identifiable information<sup>30</sup>

Members of the public

<sup>28</sup> The Systematic Alien Verification for Entitlements Program memorandum of agreement is assessable at <https://www.uscis.gov/save/prospective-user-agencies/register-an-agency-for-save> and under the “How to Register for SAVE” section.

<sup>29</sup> The Systematic Alien Verification for Entitlement Program search tool is accessible at <https://www.uscis.gov/save/save-agency-search-tool>.

<sup>30</sup> DHS defines personal information as “Personally Identifiable Information” or PII, which is any information that permits the identity of an individual to be directly or indirectly inferred, including any information that is linked or linkable to that individual, regardless of whether the individual is a U.S. citizen, lawful permanent resident, visitor to the U.S., or employee or contractor to the Department. “Sensitive PII” is PII, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. For the purposes of this PTA, SPII and PII are treated the same.



	<input checked="" type="checkbox"/> U.S. Persons (U.S citizens or lawful permanent residents)  <input checked="" type="checkbox"/> non-U.S. Persons  <input checked="" type="checkbox"/> DHS Employees/Contractors (list Components): United States Citizenship and Immigration Services  <input type="checkbox"/> Other federal employees or contractors (list agencies): <i>Click here to enter text.</i>
<p><b>2(a) Is information meant to be collected from or about sensitive/protected populations?</b></p>	<input type="checkbox"/> No <input checked="" type="checkbox"/> 8 USC § 1367 protected individuals (e.g., T, U, VAWA) <sup>31</sup> <input checked="" type="checkbox"/> Refugees/Asylees <input type="checkbox"/> Other. Please list:
<p><b>3. What specific information about individuals is collected, maintained, used, or disseminated?</b></p>	
<p><b><u>Information Collected from Requesting Agencies about applicants for benefits, licenses, or other authorized purposes:</u></b></p> <ul style="list-style-type: none"> <li>• Full Name</li> <li>• Date of birth</li> <li>• Benefit sought</li> <li>• Driver license</li> <li>• State Identification</li> <li>• Citizenship or nationality</li> <li>• Country of birth</li> <li>• A-Number</li> <li>• Social Security Number</li> <li>• Alias</li> <li>• Customer Agency-issued Case Number</li> </ul> <p><b><u>Unique Immigration Identifiers Used:</u></b></p>	

<sup>31</sup> This involves the following types of individuals: T nonimmigrant status (Victims of Human Trafficking), U nonimmigrant status (Victims of Criminal Activity), or Violence Against Women Act (VAWA). For more information about 1367 populations, please see: DHS Management Directive 002-02, Implementation of Section 1367 Information Provisions, available at <http://dhsconnect.dhs.gov/org/comp/mgmt/policies/Directives/002-02.pdf>.



- Alien number
- United States Citizenship and Immigration Services Number
- I-94 Admission Record Number (a 11-digit admission record assigned to foreign visitors entering the United States by the United States Customs and Border Protection)
- Student and Exchange Visitor Information System Identification Number
- Naturalization or Citizenship Certificate Number
- Card Number / I-797 Receipt Number (unique identifier assigned by the United States Citizenship and Immigration Services to track an immigration application or petition).
- Visa Number
- Foreign passport number (if submitted with another immigration enumerator and issuing country)

**Other Identifiers:**

- Social Security Number including a truncated version of the Social Security Number where only the last four digits are displayed, with the initial five digits are masked using asterisks (\*) or XXXXX
- United States Passport Number
- Agency Data Universal Numbering System

**Other Information:**

**Additional information requested by the agency:**

- Employment Authorization Document History
- Grant Date
- Affidavit of Support Sponsor Data<sup>32</sup>
  - Full name
  - Current mailing address - In care of name (if any)
  - Current physical address
  - Country of domicile
  - Date of birth
  - Country of birth
  - Social Security Number
  - Immigration Status
  - Sponsors A-number (if any)
  - United States Citizenship and Immigration Services Online Account Number (if any)
  - Military service
  - Employment and income
  - Federal tax return information

<sup>32</sup> A United States Citizenship and Immigration Services Affidavit of Support sponsor is an individual who signs a legal contract, Form I-864, agreeing to financially support an intending immigrant, ensuring they won't become a public charge. This sponsor is typically the U.S. citizen, lawful permanent resident, or U.S. national who filed the immigrant petition.



- Sponsor Deeming and Agency Reimbursement Information Collection
  - Whether the benefit-granting agency approved or denied the application for the means-tested public benefit.
  - If the benefit-granting agency denied the application, if the denial was based upon the information that the Systematic Alien Verification for Entitlements Program provided in its response to the citizenship and immigration status verification request from the benefit-granting agency.
  - Whether the benefit-granting agency deemed sponsor/household member income and, if not, the exception or reason for not doing so.
  - Whether the benefit-granting agency sent the sponsor a reimbursement request letter (yes/no).
  - Whether the sponsor complied with his or her reimbursement obligation.
  - Whether the benefit-granting agency conducted a collection action or other proceedings if the sponsor did not comply with his or her reimbursement obligation (yes/no and if yes, the status, court or forum, and docket or matter number).
  
- Data collected on Form I-864, Affidavit of Support Under Section 213A of the Immigration and Nationality Act
  - Principal Immigrant:
    - Full name
    - Current mailing address - In care of name (if any)
    - Current physical address
    - Country of Citizenship or Nationality
    - Date of birth
    - Alien Registration number
    - United States Citizenship and Immigration Services Online Account Number (if any)
    - Daytime telephone number
  - Principal Immigrant Family Members:
    - Full name
    - Relationship to Principal Immigrant
    - Alien Registration number
    - United States Citizenship and Immigration Services Online Account Number (if any)
    - Daytime telephone number
  - Interpreter's Contact Information, Certification and Signature:
    - Full name
    - Telephone number
    - Email address (if any)
    - Interpreter's certification and signature
  - Preparer's Contact Information:
    - Daytime number
    - Mobile number (if any)
    - Email address (if any)
    - Signature
  
- Cuban/Haitian, Immigration Status



- Violence Against Women's Act
- Request Document Review
- Citizenship Status
- Immigration Documentation (uploaded by the user agency to perform additional verification)

**Agency User Information**

- Agency point of contact name
- Agency point of contact phone number
- Initiated on
- Initiated by

**Information Shared with Social Security Administration:**

- Full Name
- Date of Birth
- Social Security Number

**DATA Received and Maintained from Social Security Administration:**

- Social Security Number Match: True/False
- Name Match: True/False
- Date of Birth Match: True/False
- Citizenship Indicator:
  - "A" - United States citizen
  - "B" - Legal alien, eligible to work
  - "C" - Legal alien, not eligible to work
  - "D" - Other
  - "E" - Alien Student - restricted work authorized
  - "F" - Conditionally legalized alien
- Foreign Born Indicator: Citizenship code is not present, but individual was foreign born
- Alien Registration Number: Where applicable
- Certificate Number: Where applicable
- Death Indicator: Yes Deceased / Not Deceased
- Error Code Descriptions: Transaction and record levels

**Information Shared with TECS (not an acronym) – TECS (not an acronym)-Travel Documents and Encounter Data for Passport query:**

- Full Name
- Date of Birth
- United States passport number



**Information Provided to Requesting User Agencies:**

- Case Verification Number: a Systematic Alien Verification for Entitlements Program generated number
- Initial Request Date
- Identification Type
- Identification Number
- Last Name
- Benefit Code
- Benefit Description
- Initial Request Response: Lawful Status, No Lawful Status, Deceased
- Additional Request Date
- Additional Request Response: Lawful Status, No Lawful Status, Deceased
- Third Step Request Date
- Third Step Resolution: Lawful Status, No Lawful Status, Deceased

**Additional information for immigrants requested from agencies for which they established the authority/need to receive**

- Employment authorization document history
- Grant date
- Affidavit of Support Sponsor Data
- Cuban/Haitian Entrant Information
- Violence Against Women's Act information
- Immigration Status
- Request document review
- Citizenship status
- Photo
- Closed Date
- Receipt number

**3(a) Does this Project, Program, or System collect, maintain, use, or disseminate Social Security numbers (SSN) or other types of stand-alone sensitive information?<sup>33</sup> If applicable, check all that apply.**

<sup>33</sup> Sensitive PII (or sensitive information) is PII that if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. More information can be found in the DHS Handbook for Safeguarding Sensitive Personally Identifiable Information, available at <https://www.dhs.gov/publication/handbook-safeguarding-sensitive-personally-identifiable-information>.



<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Social Security number</li> <li><input checked="" type="checkbox"/> Alien Number (A-Number)</li> <li><input type="checkbox"/> Tax Identification Number</li> <li><input checked="" type="checkbox"/> Visa Number</li> <li><input checked="" type="checkbox"/> Passport Number</li> <li><input type="checkbox"/> Bank Account, Credit Card, or other financial account numbers</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Social Media Handle/ID</li> <li><input checked="" type="checkbox"/> Driver's License/State ID Number</li> <li><input type="checkbox"/> Biometric identifiers (e.g., <i>FIN, EID</i>)</li> <li><input checked="" type="checkbox"/> Biometrics.<sup>34</sup> <i>Please list modalities (e.g., fingerprints, DNA, iris scans): Click here to enter text.</i></li> <li><input checked="" type="checkbox"/> Other. <i>Please list:</i> Form I-94 number, Student and Exchange Visitor Information System Identification number, Naturalization / Citizenship Certificate number, Permanent Resident Card number / Receipt number, and Visa number.</li> </ul>
<p><b>3(b) Please provide the specific legal basis for the collection of SSN:</b></p>	<p>The Social Security Number is collected from applicants and is used to verify their immigration status/United States citizenship. div. C, title VI, Section 642 of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, Pub. L. No. 104-208, 110 Stat. 3009-707, codified at 8 U.S.C. 1373 (a) and (c). Authority for having a system for verification of citizenship and immigration status of individuals seeking government benefits is governed by the Immigration Reform and Control Act of 1986 Pub. L. No. 99-603, 100 Stat. 3359.</p> <p>Sections 415 and 642 of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, authorizes the collection and use of Social Security Numbers to verify entitlement to public benefits, licenses, and credentials.</p>
<p><b>3(c) If the SSN is needed to carry out the functions and/or fulfill requirements of the Project, System, or Program, please explain why it is necessary and how it will be used.</b></p>	
<p>The Social Security Number is used to assist in identity verification for user agencies and in determining benefits eligibility. If possible, the United States Citizenship and Immigration Services will use a truncated Social Security Number if provided by the user agency.</p>	

<sup>34</sup> If related to IDENT/HART and applicable, please complete all Data Access Request Analysis (DARA) requirements. This form provides privacy analysis for DHS' IDENT, soon to be HART. The form replaces a PTA where IDENT is a service provider for component records. PRIV uses this form to better understand how data is currently shared, will be shared and how data protection within IDENT will be accomplished. IDENT is a biometrics service provider and any component or agency submitting data to IDENT is a data provider.



<p><b>3(d) If the Project, Program, or System requires the use of SSN, what actions are being taken to abide by Privacy Policy Instruction 047-01-010, <i>SSN Collection and Use Reduction</i>,<sup>35</sup> which requires the use of privacy-enhancing SSN alternatives when there are technological, legal, or regulatory limitations to eliminating the SSN? Note: even if you are properly authorized to collect SSNs, you are required to use an alternate unique identifier. If there are technological, legal, or regulatory limitations to eliminating the SSN, privacy-enhancing alternatives should be taken, such as masking, truncating, or encrypting the SSN, or blocking the display of SSNs in hard copy or digital formats.</b></p>	
<p>The United States Citizenship and Immigration Services has traditionally used an alternative number to the Social Security Number to access records to determine the citizenship/immigration status of user agencies benefit applicants in compliance with the Department of Homeland Security privacy-related policies. However, United States Citizenship and Immigration Services now needs to collect Social Security numbers to facilitate user agencies' ability to submit a request for citizenship/immigrations status of benefit applicants. The United States Citizenship and Immigration Services is working to implement use of the truncated form of a Social Security number (i.e. the last four numbers of a Social Security number rather than the full identifier) to retrieve information from the Social Security Administration. The Systematic Alien Verification for Entitlements Program's user interface will mask the full Social Security Number during data inputs, except for when information is submitted via the bulk uploader. In compliance with the security policy for Social Security numbers, server-side encryption is used for Amazon Simple Storage Service<sup>36</sup> and Amazon Relational Database Services<sup>37</sup> databases. This uses key management provided by Amazon Web Services for the storage buckets and Relational Database Services databases where Social Security Numbers are housed. Social Security Numbers and Personally Identifiable Information are not exposed in any hard copy documents available for extract from the information system. Additionally, in accordance with the National Institute of Science and Technology and Department of Homeland Security information security and privacy policies, the Systematic Alien Verification for Entitlements Program maintains moderate level controls for the confidentiality of information within the tool.</p>	

<p><b>4. How does the Project, Program, or System retrieve information?</b></p>	<p><input checked="" type="checkbox"/> By a unique identifier.<sup>38</sup> Please list all unique identifiers used:</p> <ul style="list-style-type: none"> <li>• Full name</li> <li>• Alias</li> </ul>
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<sup>35</sup> See <https://www.dhs.gov/publication/privacy-policy-instruction-047-01-010-ssn-collection-and-use-reduction>.

<sup>36</sup> Amazon Simple Storage Service (Amazon S3) is an object storage service offering industry-leading scalability, data availability, security, and performance. Organizations can use this service to store, manage, analyze, and protect any amount of data for virtually any use case, such as data lakes, cloud-native applications, and mobile apps.

<sup>37</sup> Amazon Relational Database Service (Amazon RDS) is an easy-to-manage relational database service optimized for total cost of ownership. It is simple to set up, operate, and scale with demand. Amazon RDS automates undifferentiated database management tasks, such as provisioning, configuring, backing up, and patching. Amazon RDS allows customers to create a new database in minutes and offers flexibility to customize databases to meet their needs.

<sup>38</sup> Generally, a unique identifier is considered any type of "personally identifiable information," meaning any information that permits the identity of an individual to be directly or indirectly inferred, including any other information which is linked or linkable to that individual regardless of whether the individual is a U.S. citizen, lawful permanent resident, visitor to the U.S., or employee or contractor to the Department.



	<ul style="list-style-type: none"> <li>• Date of birth</li> <li>• Immigration enumerator: <ul style="list-style-type: none"> <li>○ Alien number/United States Citizenship and Immigration Services Number,</li> <li>○ Form I-94, Arrival/Departure Record number,</li> <li>○ Student and Exchange Visitor Information System Identification number,</li> <li>○ Citizenship or Naturalization Certificate number</li> <li>○ Card Number / I-797 Receipt Number,</li> <li>○ Visa Number, or</li> <li>○ Foreign passport number (if submitted with another immigration enumerator) and issuing country</li> </ul> </li> <li>• Social Security Number</li> <li>• United States passport number</li> <li>• Customer Agency-issued Case Number</li> <li>• Case Verification Number</li> </ul> <p><input type="checkbox"/> By a non-unique identifier or other means. Please describe: <i>Click here to enter text.</i></p>
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<p><b>5. What is the records retention schedule(s) for the information collected for each category type (include the records schedule number)? <i>If no schedule has been approved, please provide proposed schedule or plans to determine it.</i></b></p> <p><i>Note: If no records schedule is in place or are unsure of the applicable records schedule, please reach out to the appropriate Records Management Office.<sup>39</sup></i></p>	<p>Data within Systematic Alien Verification for Entitlements Program is retained for 10 years after the final match determination of the employee or applicant in accordance with NARA approved records retention schedule N1-566-08-07.</p> <p>All United States Citizenship and Immigration Services verification requests will be documented in a transactional database. The retention period is 10 years. The database is not accessible to the public, except as permitted.</p>
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<sup>39</sup> See <https://dhsconnect.dhs.gov/org/comp/mgmt/ocio/cdod/rm/Pages/DHS-Records-Officers.aspx>



<p><b>5(a) How does the Project, Program, or System ensure that records are disposed of or deleted in accordance with the retention schedule (e.g., technical/automatic purge, manual audit)?</b></p>	<p>Data is automatically purged annually based on NARA disposal schedule N1-566-08-07.</p>
<p><b>6. Does this Project, Program, or System connect, receive, or share PII with any other DHS/Component projects, programs, or systems?<sup>40</sup></b></p>	<p><input type="checkbox"/> No.</p> <p><input checked="" type="checkbox"/> Yes. If yes, please list:</p> <p><b>United States Citizenship and Immigration Services Systems:</b></p> <ul style="list-style-type: none"> <li>• Central Index System</li> <li>• Electronic Immigration System</li> <li>• Computer Linked Application Information Management System 3</li> <li>• Enterprise Citizenship and Immigration Services Centralized Operational Repository</li> <li>• GLOBAL (not an acronym)</li> <li>• RAILS (not an acronym)</li> <li>• Customer Profile Management System</li> <li>• Reengineered Naturalization Application Casework System</li> <li>• Marriage Fraud Amendment System</li> <li>• Salesforce Customer Relationship Management Customer Relationship Management<sup>41</sup></li> </ul> <p><b>Department of Homeland Security Systems:</b></p> <ul style="list-style-type: none"> <li>• Department of Homeland Security OneNet</li> <li>• Immigration and Custom Enforcement Student and Exchange Visitor Information System</li> <li>• Immigration and Custom ENFORCE Integrated Database</li> </ul>

<sup>40</sup> PII may be shared, received, or connected to other DHS systems directly, automatically, or by manual processes.

<sup>41</sup> Provides a unified platform where data from different departments can be accessed and used to improve customer interactions.



	<ul style="list-style-type: none"> <li>• Customs and Border Protection Arrival and Departure Information System</li> <li>• Customs and Border Protection TECS (not an acronym) - Travel Documents and Encounter Data - USPassportRESTService</li> <li>• Transportation Security Administration Technology Infrastructure Modernization and Vetting and Credentialing System</li> </ul>
<p><b>7. Does this Project, Program, or System connect, receive, or share PII with any external (non-DHS) government or non-government partners or systems?</b></p>	<p><input type="checkbox"/> No.</p> <p><input checked="" type="checkbox"/> Yes. If yes, please list:</p> <p>The following are systems/organizations that the Systematic Alien Verification for Entitlements Program collects/shares information to support user agencies' requests:</p> <ul style="list-style-type: none"> <li>• United States Military Entrance Processing Command Integrated Resource System</li> <li>• Department of Education Federal Student Aid Central Processing System</li> <li>• Department of Health and Human Services Centers for Medicare &amp; Medicaid Services</li> <li>• Social Security Administration Numident system</li> <li>• Department of Justice Executive Office for Immigration's Immigration Review Information Exchange System</li> <li>• Department of State Consular Consolidated Database Passport</li> </ul> <p>The following are systems/organizations that the Systematic Alien Verification for Entitlements provides information that determine benefit eligibility:</p> <ul style="list-style-type: none"> <li>• Various federal agencies in their role as a user agency</li> </ul>



	<ul style="list-style-type: none"> <li>• Various state, local, tribal, and territory agencies in their role as a Systematic Alien Verification for Entitlements Program user agency</li> </ul>
<p><b>8. Is this sharing pursuant to new or existing information sharing agreement (MOU, MOA, LOI, RTA, etc.)? If applicable, please provide agreement as an attachment.</b></p>	<p>Existing</p> <p>Please describe applicable information sharing governance in place:</p> <ul style="list-style-type: none"> <li>• Letter of Agreement between United States Citizenship and Immigration Services and Social Security Administration</li> <li>• Information Sharing Agreement between the Department of Homeland Security, United States Citizenship and Immigration Services and the Social Security Administration regarding citizenship</li> <li>• Computer Matching Agreement with Department of Education</li> <li>• Memorandum of Agreements between United States Citizenship and Immigration Services and each individual user agency</li> </ul>
<p><b>9. Does the Project, Program, or System or have a mechanism to track external disclosures of an individual's PII?</b></p>	<p><input type="checkbox"/> No. What steps will be taken to develop and maintain the accounting: <i>Click here to enter text.</i></p> <p><input checked="" type="checkbox"/> Yes. In what format is the accounting maintained if appropriate (e.g., disclosures to the Department of Justice Office of Special Counsel, Immigration and Customs Enforcement). Verification Information System also has a transactional log that enables the recreation of accounting of disclosures.</p>
<p><b>10. Does this Project, Program, or System use or collect data involving or from any of the following technologies:</b></p>	<p><input type="checkbox"/> Social Media</p> <p><input type="checkbox"/> Advanced analytics<sup>42</sup></p> <p><input type="checkbox"/> Live PII data for testing</p>

<sup>42</sup> The autonomous or semi-autonomous examination of Personally Identifiable Information using sophisticated techniques and tools to draw conclusions. Advanced Analytics could include human-developed or machine-developed algorithms and encompasses, but is not limited to, the following: data mining, pattern and trend analysis, complex event processing, machine learning or deep learning, artificial intelligence, predictive analytics, big data analytics.



	<input checked="" type="checkbox"/> No
<b>11. Does this Project, Program, or System use data to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly indicative of terrorist or criminal activity on the part of any individual(s) (i.e., data mining)?<sup>43</sup> This does not include subject-based searches.</b>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please elaborate: <i>Click here to enter text.</i>
<b>11(a) Is information used for research, statistical, or other similar purposes? If so, how will the information be de-identified, aggregated, or otherwise privacy-protected?</b>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please elaborate: <i>Click here to enter text.</i>
<b>12. Does the planned effort include any interaction or intervention with human subjects<sup>44</sup> via pilot studies, exercises, focus groups, surveys, equipment or technology, observation of public behavior, review of data sets, etc. for <u>research purposes</u></b>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please reach out to the DHS Compliance Assurance Program Office (CAPO) for <u>independent</u> review and approval of this effort. <sup>45</sup>
<b>13. Does the Project, Program, or System provide role-based or additional privacy training for personnel who have access, <u>in addition</u> to annual privacy training required of all DHS personnel?</b>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: <i>Click here to enter text.</i>

<sup>43</sup> Is this a program involving pattern-based queries, searches, or other analyses of one or more electronic databases, where—

(A) a department or agency of the Federal Government, or a non-Federal entity acting on behalf of the Federal Government, is conducting the queries, searches, or other analyses to discover or locate a predictive pattern or anomaly indicative of terrorist or criminal activity on the part of any individual or individuals.

(B) the queries, searches, or other analyses are not subject-based and do not use personal identifiers of a specific individual, or inputs associated with a specific individual or group of individuals, to retrieve information from the database or databases; and

(C) the purpose of the queries, searches, or other analyses is not solely—

(i) the detection of fraud, waste, or abuse in a government agency or program; or

(ii) the security of a government computer system.

<sup>44</sup> Human subject means a living individual about whom an investigator conducting research: (1) obtains information or biospecimens through intervention or interaction with the individual, and uses, studies, or analyzes the information or biospecimens; or (2) obtains, uses, studies, analyzes, or generates identifiable private information or identifiable biospecimens.

<sup>45</sup> For more information about CAPO and their points of contact, please see: <https://www.dhs.gov/publication/capo> or <https://collaborate.st.dhs.gov/orgs/STCSSites/SitePages/Home.aspx?orgid=36>. For more information about the protection of human subjects, please see DHS Directive 026-04: [https://www.dhs.gov/sites/default/files/publications/mgmt/general-science-and-innovation/mgmt-dir\\_026-04-protection-of-human-subjects\\_revision-01.pdf](https://www.dhs.gov/sites/default/files/publications/mgmt/general-science-and-innovation/mgmt-dir_026-04-protection-of-human-subjects_revision-01.pdf).



<p><b>14. Is there a FIPS 199 determination?<sup>46</sup></b></p>	<p><input type="checkbox"/> No.</p> <p><input checked="" type="checkbox"/> Yes. Please indicate the determinations for each of the following:</p> <p>Confidentiality:  <input type="checkbox"/> Low <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined</p> <p>Integrity:  <input type="checkbox"/> Low <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined</p> <p>Availability:  <input type="checkbox"/> Low <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined</p>
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### PTA REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE REVIEWER)

<b>Component Privacy Office Reviewer:</b>	Chiquita Jones/LeVar Sykes
<b>Component Privacy Office Senior Reviewer:</b>	Shannon DiMartino
<b>PRIVCATS ID Number:</b>	0019946
<b>Date submitted to Component Privacy Office:</b>	May 5, 2025
<b>Concurrence from other Component Reviewers involved (if applicable):</b>	Catherine Shorten, Customs and Border Protection, concurrence provided 6/5/2025
<p><b>Component Privacy Office Recommendation:</b>  <i>Please include recommendation below, including what new privacy compliance documentation is needed, as well as any specific privacy risks/mitigations, as necessary.</i></p>	
<p>The United States Citizenship and Immigration Services submits this updated Privacy Threshold Analysis to document the United States Citizenship and Immigration Services Verification Division and Office of Technology (OIT) changes to the Systematic Alien Verification for Entitlements Program. The United States Citizenship and Immigration Services administers the Systematic Alien Verification for Entitlements Program which is an inter-governmental initiative that provides a web-based service to help</p>	

<sup>46</sup> FIPS 199 is the Federal Information Processing Standard Publication 199, Standards for Security Categorization of Federal Information and Information Systems and is used to establish security categories of information systems. For more information, see <https://www.nist.gov/itl/fips-general-information>.



federal, state, territorial, tribal and local agencies and other governmental entities verify United States citizenship or immigration status/category information of applicants for benefits, licenses, or other authorized purposes.

This Privacy Threshold Analysis documents the following changes to the Systematic Alien Verification for Entitlements Program:

1. Expanded search capabilities to allow approved Systematic Alien Verification for Entitlements Program user agencies to verify United States citizenship information using Social Security Numbers and other non-Department of Homeland Security enumerators.
2. A new Social Security Administration system connection to support verification of citizenship/immigration status.
3. A new bulk uploader/list processor function that allows user agencies to upload lists of benefit applicants.
4. Use of the Voter Registration and Voter List Maintenance Verification functionality.
5. The collection of information from the Department of State's Consular Consolidated Database/American Citizen Record Query system.
6. An integration with the Customs and Border Protection TECS (not an acronym) - Travel Documents and Encounter Data system.

The United States Citizenship and Immigration Services Privacy Office recommends Privacy Impact Assessment coverage for the Systematic Alien Verification for Entitlements Program to comply with the eGovernment Act of 2002 as it "collects, maintains, or disseminates information that is in an identifiable form." The information collected, used, stored, and/or disseminated by the Systematic Alien Verification for Entitlements Program meets the definition of Personally Identifiable Information ("PII")/Sensitive Personally Identifiable Information ("SPII")<sup>47</sup> as it "permits the identity of an individual to be directly or indirectly inferred, including any other information that is linked or linkable to that individual, regardless of whether that individual is a United States citizen, legal permanent resident, or a visitor to the United States, or employee or contractor to the Department." Specifically, the Systematic Alien Verification for Entitlements Program involves information from members of the public applying for benefits, licenses, or other authorized purposes which may include (1) United States citizens and legal permanent residents, (2) individuals who are now current United States citizens and legal permanent residents after previously naturalizing or adjusting their status, or (3) individuals who may ultimately naturalize to become United States citizens or adjust their status to receive legal permanent residency in the future. Depending on the eligibility category certain individuals may be eligible to apply for adjustment of status as soon as one (1) year after their initial immigration benefit is granted,<sup>48</sup> therefore the United States Citizenship and Immigration Services Privacy Office recommends requiring Privacy Impact Assessment coverage for the Systematic Alien Verification for Entitlements Program to ensure all current and future United States

<sup>47</sup> Personally Identifiable Information (PII) has numerous official definitions, but in general, it is defined as any information that can be used to identify an individual directly or indirectly, such as a name, email address, Social Security Number or IP address. Sensitive PII (SPII) is generally defined as any PII that if lost, stolen, or disclosed without authorization could result in significant harm to an individual.

<sup>48</sup> For more information on eligibility categories please refer to: <https://www.uscis.gov/green-card/green-card-eligibility-categories>.



citizens and legal permanent residents have transparency into how the United States Citizenship and Immigration Services may collect, store, use, and share the information they previously provided to the United States Citizenship and Immigration Services.

The Privacy Office's Technology Oversight Branch recommends that the Systematic Alien Verification for Entitlements Program continues to be designated as a privacy sensitive program that requires privacy compliance coverage. The Technology Oversight Branch recommends that with the new updates to the program documented in this Privacy Threshold Analysis the Systematic Alien Verification for Entitlements Program be identified as not in compliance with the Privacy Act of 1974, as amended, or the E-Government Act of 2002. A Privacy Impact Assessment update and a System of Records Notice update should be published prior to the program's changed collection and use of Personally Identifiable Information, including information on natural born United States citizens. Further, the sharing of Personally Identifiable Information with the Social Security Administration should occur after the System of Records Notice has gone through the required 30-day comment period. The following are the Technology Oversight Branch's recommendations for privacy compliance coverage and additional requirements:

### **Privacy Impact Assessment**

- A new Privacy Impact Assessment Update for DHS/USCIS/PIA-006 Systematic Alien Verification for Entitlements Program must be completed before collection and use of additional information. Specifically, these Privacy Impact Assessment updates would include, but are not limited to:
  - The collection of Social Security Numbers and other information from the Social Security Administration regarding United States citizens, including natural born citizens.
  - The change in legal rationale for now collecting and maintaining Social Security Numbers of United States natural born citizens.
  - The collection and use of Passport Numbers from the Department of State via new system connections.
  - The addition of the Voter Registration and Voter List Maintenance Verification process, including how this process may verify the citizenship status of natural born United States citizens.
  - The implementation of the bulk case upload functionality for User Agencies.
  - Additional privacy risks and mitigation strategies regarding notice, consent, and data accuracy.

### **System of Records Notice**

- An update to DHS/USCIS-004 Systematic Alien Verification for Entitlements Program must be completed before the collection and sharing of additional information. Specifically, these System of Records Notice updates would include, but are not limited to changes to the following sections:
  - Purpose: The System of Records Notice does not currently include the verification of voter registration and voter maintenance lists.



- Categories of Individuals: Currently, USCIS specifically informs the public it only collects information on naturalized or acquired United States citizens. This section must be updated to discuss that information on natural born United States citizens will also be collected.
- Categories of Records: The System of Records Notice currently informs the public that the Systematic Alien Verification for Entitlements Program only collects Social Security Number of immigrants on the United States Citizenship and Immigration Services Form G-845. This section must be updated to cover the expanded collection and use of Social Security Numbers.
- Sources of Records: The System of Records Notice currently doesn't include the Social Security Administration system of records. This section must be updated to reflect all new source systems including the Social Security Administration Numident system.
- DHS/CBP-011 Customs and Border Protection Primary and Secondary Processing (TECS (not an acronym)) National SAR Initiative December 19, 2008 (73 Federal Register 77778)
- STATE-26 Passport Records, March 24, 2015 (80 Federal Register 15653)
- STATE-39 Visa Records, November 8, 2021 (86 Federal Register 61822)
- SSA-60-0058 Master Files of Social Security Number Holders and Social Security Number Applications, February 20, 2025 (90 Federal Register 10025)

The following is a Plan of Action to ensure that the Systematic Alien Verification for Entitlements Program is brought into compliance with all federal statutes, regulations, and Department of Homeland Security policies.

### **USCIS Privacy's Action Plan for the Systematic Alien Verification for Entitlements Program**

The Systematic Alien Verification for Entitlements Program is an inter-governmental initiative that provides a web-based service to help federal, state, territorial, tribal and local agencies and other governmental entities verify United States citizenship or immigration status/category information of applicants for benefits, licenses, or other authorized purposes.

#### **Action Plan**

This plan outlines priority actions necessary to advance the goal and objective of ensuring the Systematic Alien Verification for Entitlements Program is compliant with all applicable privacy laws, regulations, and policies. These actions will ensure that the use of technology by United States Citizenship and Immigration Services and the Systematic Alien Verification for Entitlements Program sustains and does not erode privacy protections relating to the collection, use, dissemination, maintenance, and disposal of personal information. These actions include actively working with the Verification Division, Office of Chief Counsel and the Customs and Border Protection Office of Privacy on this Privacy Threshold Analysis and the draft System of Records Notice along with continued collaboration with these stakeholders and others such as the Department of Homeland Security Privacy Office to ensure Systematic Alien Verification for Entitlements Program is in compliance.

#### **Actions to Be Taken**



To meet these objectives the United States Citizenship and Immigration Services Office of Privacy will complete the following activities:

- Receive United States Citizenship and Immigration Services Chief Privacy Officer adjudication of the initial Systematic Alien Verification for Entitlements Program Privacy Threshold Analysis:
  - Adjudication - Estimated Date of Completion: July 2025
- Draft an updated Systematic Alien Verification for Entitlement Program Privacy Impact Assessment meeting all requirements identified above and submit the draft to the Department of Homeland Security Office of Privacy.
  - Initial Draft - Estimated Date of Completion: July 2025
  - Office of Chief Counsel Review – Estimated Date of Completion: July 2025
  - Submission to Department of Homeland Security – Estimated Date of Completion: August 2025
  - Publication – Estimated August 2025
- Draft an updated Systematic Alien Verification for Entitlement Program System of Records Notice meeting all requirements identified above and submit the draft to the Department of Homeland Security Office of Privacy.
  - Initial Draft - Estimated Date of Completion: June 2025
  - Office of Chief Counsel Review – Estimated Date of Completion: June 2025
  - Submission to Department of Homeland Security – Estimated Date of Completion: July 2025
  - Submission to the Office of Management and Budget and Congress – Estimated July 2025
  - Publication – Estimated July 2025
  - End of 30-day commenting period (and sharing of new routine uses) Estimated August/September 2025
- Draft a Privacy Threshold Analysis documenting the new Systematic Alien Verification for Entitlement Program information sharing agreement between the United States Citizenship and Immigration Services and the Social Security Administration and receive the Chief Privacy Officer's adjudication of the Privacy Threshold Analysis.
  - Estimated Date of Completion: July 2025
- Determine the applicability of the Computer Matching and Privacy Protection Act of 1988 to new or changed aspects of the Systematic Alien Verification for Entitlements Program including the new bulk upload functionality for User Agencies.
  - Hold a discussion regarding the Computer Matching Agreement impacts with representatives from the Department of Homeland Security Privacy Office, United States



Citizenship and Immigration Services Office of Chief Counsel and Office of Privacy, and Department of Homeland Security Office of General Council.

- Date of Completion: June 2025
- Decide on the need for Computer Matching Agreements with user agencies versus the current Memorandum of Agreements in place with each Systematic Alien Verification for Entitlement Program user agency:
  - Estimated Date of Completion: July 2025

This Privacy Threshold Analysis and Action Plan focuses predominantly on Phases One through Four of the Systematic Alien Verification for Entitlements Program Optimization effort as Phase Five and Phase Six are longer term goals of the optimization effort and are still in the exploratory/planning stage. The United States Citizenship and Immigration Services will update this Privacy Threshold Analysis and Action Plan as needed to support the remaining phases during their development and ensure the Systematic Alien Verification for Entitlements Program is compliant with all applicable laws, regulations, and Department of Homeland Security policies.

The updated Privacy Threshold Analyst should also provide, at a minimum, the following updates:

- New status types that Systematic Alien Verification for Entitlements Program may provide to the user agencies and how any additional verification is completed.
- A discussion about the update to the user memorandum of agreements and the creation of the voter verification specific memorandum of agreements.
- Confirm all responses from the Customs and Border Protection via the use of their USPassportRESTService when matching United States Passport numbers.
- Discuss Customs and Border Protection authority/purpose for collecting United States Passport related photographs and collection of those photographs by the United States Citizenship and Immigration Services.
- A description of how the information received via the integration with the Department of Justice to enable an incarceration/felony related flag will be used internally and if any related information will be sent to the user agencies or the applicants.
- If the Systematic Alien Verification for Entitlements Program will use the existing connection by the E-Verify Program to the USPassportRESTService or will it be a new connection.
- Additional use case information for the Systematic Alien Verification for Entitlements Program use of Department of State information from the USPassportRESTService and the Department of State's Consular Consolidated Database / American Citizen Record Query system.
- Clarification regarding user agency benefit applicants accessing the Systematic Alien Verification for Entitlements Program.
- Additional information regarding notification provided to United States citizens regarding user agencies use of their information.
- What information may be provided to the user agency about the VAWA status of an individual.



- Discussion of if there could be instances when a natural born United States citizen is unable to be verified based on the data available. Also, if all United States citizens would be able to be verified via the SSA information.
- Confirmation if there are additional responses (besides Lawful Status, No Lawful Status, or Deceased) provided to user agencies now that United States citizens can also be verified.
- A discussion of any updates regarding any new agreements between Department of State and Customs and Border Protection for the sharing and use of United States Passport number information.
- Confirmation of if there is still a connection with the Reengineered Naturalization Application Casework System (which was previously decommissioned) or how information from the previously decommissioned system is still accessed.

### PTA ADJUDICATION

(TO BE COMPLETED BY THE COMPONENT PRIVACY OFFICE APPROVER)

<b>Component Privacy Office Approver:</b>	<b>Angela Y. Washington</b>
<b>PTA Approval Date:</b>	July 17, 2025
<b>PTA Expiration Date:</b>	October 17, 2025

### DESIGNATION

<b>Privacy Sensitive System:</b>	Yes
<b>Category of System:</b>	System If "other" is selected, please describe: <i>Click here to enter text.</i>
<b>Determination:</b>	<input type="checkbox"/> Project, Program, System in compliance with full coverage. <input type="checkbox"/> Project, Program, System in compliance with interim coverage. <input type="checkbox"/> Project, Program, System in compliance until changes implemented. <input checked="" type="checkbox"/> Project, Program, System not in compliance.
<b>PIA:</b>	<b>PIA Update is required.</b> <ul style="list-style-type: none"> <li>• DHS/USCIS/PIA-006 Systematic Alien Verification for Entitlement Program             <ul style="list-style-type: none"> <li>○ This PIA must be updated to document all identified system/programmatic changes.</li> </ul> </li> </ul>



<b>SORN:</b>	<p><b>SORN update is required.</b></p> <ul style="list-style-type: none"> <li>• DHS/USCIS-004 Systematic Alien Verification for Entitlements Program, May 27, 2020 (85 FR 31798) <ul style="list-style-type: none"> <li>◦ This SORN must be updated to document all identified changes.</li> </ul> </li> <li>• DHS/CBP-011 Customs and Border Protection Primary and Secondary Processing (TECS (not an acronym)) National SAR Initiative December 19, 2008 (73 Federal Register 77778)</li> <li>• STATE-26 Passport Records, March 24, 2015 (80 Federal Register 15653)</li> <li>• STATE-39 Visa Records, November 8, 2021 (86 Federal Register 61822)</li> <li>• SSA-60-0058 Master Files of Social Security Number Holders and Social Security Number Applications, February 20, 2025 (90 Federal Register 10025)</li> </ul>
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**Component Privacy Office Adjudication:**

*Please describe rationale for privacy compliance determination above, and any further action(s) that must be taken by Component.*

The USCIS Office of Privacy is submitting this Privacy Threshold Analysis (PTA) to document the Systematic Alien Verification for Entitlements (SAVE) Program. The Systematic Alien Verification for Entitlements Program is an intergovernmental initiative using a web-based service to help federal, state, territorial, tribal and local benefit-issuing and licensing agencies and other governmental entities determine the immigration status or United States citizenship of applicants for public benefits, licenses, grants, credentials, background investigations, and other lawful purposes, so only entitled applicants receive them. The Systematic Alien Verification for Entitlements Program verifies immigration status/category and United States citizenship against Department of Homeland Security-accessed records. The Systematic Alien Verification for Entitlements Program is not a database but queries Department of Homeland Security-accessed federal records to provide registered user agencies with a verification response. The Systematic Alien Verification for Entitlements Program does not determine an applicant's eligibility for a specific benefit or license, as this is the responsibility of the benefit/license granting agency.

This Privacy Threshold Analysis is being submitted to document multiple updates and planned updates to the Systematic Alien Verification for Entitlements Program as part of the comprehensive optimization of the Systematic Alien Verification for Entitlements Program to ensure a single, reliable source for verifying immigration status and United States citizenship nationwide. This Privacy Threshold Analysis documents the following key changes: (1) an expanded search capabilities to allow approved Systematic Alien Verification for Entitlements Program user agencies to verify United States citizenship information using Social Security Numbers and other non-Department of Homeland Security enumerators, (2) a new Social Security Administration system connection to support verification of citizenship/immigration status, (3) a new bulk uploader/list processor function that allows user agencies to upload lists of benefit applicants, (4) the use of the Voter Registration and Voter List Maintenance Verification functionality, (5) the collection of information from the Department of State's Consular Consolidated Database/ American



Citizen Record Query system, and (6) an integration with the Customs and Border Protection TECS (not an acronym) - Travel Documents and Encounter Data system.

After a thorough review of the PTA, the USCIS Office of Privacy continues to designate the Systematic Alien Verification for Entitlements Program as a privacy sensitive system/program requiring both Privacy Impact Assessment (PIA) and System of Records Notice (SORN) coverage as it collects/uses Personally Identifiable Information (PII) as well as Sensitive Personally Identifiable Information (SPII) from members of the public, including legal permanent residents and United States Citizens.

The United States Citizenship and Immigration Services Office of Privacy recommends Privacy Impact Assessment coverage for the Systematic Alien Verification for Entitlements Program to comply with the eGovernment Act of 2002 as it “collects, maintains, or disseminates information that is in an identifiable form.” The information collected, used, stored, and/or disseminated by the Systematic Alien Verification for Entitlements Program meets the definition of Personally Identifiable Information (“PII”)/Sensitive Personally Identifiable Information (“SPII”)<sup>49</sup> as it “permits the identity of an individual to be directly or indirectly inferred, including any other information that is linked or linkable to that individual, regardless of whether that individual is a United States citizen, legal permanent resident, or a visitor to the United States, or employee or contractor to the Department.” Specifically, the Systematic Alien Verification for Entitlements Program involves information from members of the public applying for benefits, licenses, or other authorized purposes which may include (1) United States citizens and legal permanent residents, (2) individuals who are now current United States citizens and legal permanent residents after previously naturalizing or adjusting their status, or (3) individuals who may ultimately naturalize to become United States citizens or adjust their status to receive legal permanent residency in the future. Depending on the eligibility category certain individuals may be eligible to apply for adjustment of status as soon as one (1) year after their initial immigration benefit is granted,<sup>50</sup> therefore the United States Citizenship and Immigration Services Office of Privacy recommends requiring Privacy Impact Assessment coverage for the Systematic Alien Verification for Entitlements Program to ensure all current and future United States citizens and legal permanent residents have transparency into how the United States Citizenship and Immigration Services may collect, store, use, and share the information they previously provided to the United States Citizenship and Immigration Services.

Privacy Impact Assessment (PIA) coverage is provided by the following:

- DHS/USCIS/PIA-006 Systematic Alien Verification for Entitlement Program
  - **For the Systematic Alien Verification for Entitlement Program to be in compliance with the eGovernment Act of 2002, this Privacy Impact Assessment must be**

<sup>49</sup> Personally Identifiable Information (PII) has numerous official definitions, but in general, it is defined as any information that can be used to identify an individual directly or indirectly, such as a name, email address, Social Security Number or IP address. Sensitive PII (SPII) is generally defined as any PII that if lost, stolen, or disclosed without authorization could result in significant harm to an individual.

<sup>50</sup> For more information on eligibility categories please refer to: <https://www.uscis.gov/green-card/green-card-eligibility-categories>.



**updated to reflect the identified system and programmatic changes along with a privacy risk assessment of these changes including but not limited to new collections of data, new populations impacted including natural born US citizens, new system connections, new data sharing, and a new bulk upload/reporting functionality.**

System of Records Notice (SORN) coverage is required as the information in the Systematic Alien Verification for Entitlement Program is retrieved by a personal identifier. System of Records Notice coverage is provided by the following:

- DHS/USCIS-004 Systematic Alien Verification for Entitlements Program, May 27, 2020 (85 FR 31798)
  - **For the Systematic Alien Verification for Entitlement Program to be in compliance with the Privacy Act of 1974, this System of Records Notice must be updated to reflect the identified system and programmatic changes including that the System of Records will now include information on natural born United States citizens in addition to naturalized or acquired United States citizens. Updates to the System of Records Notice should include but are not limited to updates in the Purpose, Categories of Individuals, Categories of Records, and the Sources of Records sections.**
- DHS/CBP-011 Customs and Border Protection Primary and Secondary Processing (TECS (not an acronym)) National SAR Initiative December 19, 2008 (73 Federal Register 77778)
- STATE-26 Passport Records, March 24, 2015 (80 Federal Register 15653)
- STATE-39 Visa Records, November 8, 2021 (86 Federal Register 61822)
- SSA-60-0058 Master Files of Social Security Number Holders and Social Security Number Applications, February 20, 2025 (90 Federal Register 10025)

While there are currently published SORNs and PIAs associated with the Systematic Alien Verification for Entitlement Program, these documents do not sufficiently provide coverage for the recently implemented and planned system and programmatic changes documented in this Privacy Threshold Analysis. Therefore, the Systematic Alien Verification for Entitlement Program is not in compliance. An updated Privacy Impact Assessment and an updated System of Records Notice must be published for the Systematic Alien Verification for Entitlement Program to be brought into compliance.

An action plan has been developed to enable the Systematic Alien Verification for Entitlement Program to be brought into compliance with all federal laws, statutes, regulations, and Department of Homeland Security policies. A high-level summary of the action plan is as follows:

- Complete the initial Systematic Alien Verification for Entitlements Program Privacy Threshold Analysis.



# Homeland Security

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- Publish an updated Systematic Alien Verification for Entitlement Program Privacy Impact Assessment to the Department of Homeland Security Office of Privacy website.
- Publish an updated Systematic Alien Verification for Entitlement Program System of Records Notice in the Federal Register and address any comments received during the 30-day public comment period.
- Complete a Privacy Threshold Analysis documenting the new Systematic Alien Verification for Entitlement Program information sharing agreement between the United States Citizenship and Immigration Services and the Social Security Administration.
- Determine the applicability of the Computer Matching and Privacy Protection Act of 1988 and complete any identified requirements.
- Update the Systematic Alien Verification for Entitlements Program Privacy Threshold Analysis and Action Plan as needed to support the ongoing optimization effort.

The Office of Privacy approves this Privacy Threshold Analysis for 3 months to formally document the current privacy posture of the Systematic Alien Verification for Entitlement Program.