USCIS's Refugees, Asylum, and Parole System (RAPS)

- Class of Admission
- Country of Birth
- Date of Birth
- Date of Entry
- Current Status
- Asylum Applicant Receipt Date

USCIS's Reengineered Naturalization Applications Casework System (RNACS)

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

Immigration and Customs Enforcement (ICE)'s Student and Exchange Visitor Identification System (SEVIS)

- Student and Exchange Visitor Identification Number (SEVIS ID)
- Last Name
- First Name
- Middle Name
- Date of Birth
- Country of Birth
- Class of Admission
- I-94 Number
- Date of Entry
- Valid To Date

- Social Security Number
- Nationality
- Gender
- Student Status
- Visa Code
- Status Change Date
- Port of Entry Code
- Non Citizen Entry Date
- Status Code
- Program End Date

Quick Reference of SAVE Systems and their Use for Each Step of Verification
(Sorted by Commonly Used Name Acronym)

Initial Verification (also used during Second and Third Step Verification)

- Central Index System (CIS)
- USCIS's Computer-Linked Application Information Management System Version 3 (CLAIMS 3)
- USCIS's Computer-Linked Application Information Management System Version 4.0 (CLAIMS 4)
- USCIS's Image Storage and Retrieval System (ISRS)
- USCIS's Reengineered Naturalization Applications Casework System (RNACS)
- Immigration and Customs Enforcement (ICE)'s Student and Exchange Visitor Identification System (SEVIS)

Second and Third Step Verification

- United States Visitor and Immigrant Status Indicator Technology (US-VISIT)'s Arrival Departure Information System (ADIS)
- Department of State (DOS)'s Consular Consolidated Database (DOS-CCD)
- ICE's ENFORCE Integrated Database (EID) Enforcement Alien Removal Module (EARM) USCIS's Enterprise Document Management System (EDMS)
- Department of Justice's Executive Office of Immigration Review System (EOIR)
- USCIS's Marriage Fraud Amendment System (MFAS)
- USCIS's Microfilm Digitization Application System (MiDAS)
- USCIS's National File Tracking System (NFTS)
- USCIS's Refugees, Asylum, and Parole System (RAPS)

Appendix B

Description of Federal Government Databases

- Arrival Departure Information System (ADIS): ADIS contains information on individuals arriving and departing at United States ports of entry. This information includes biographic information from passenger manifests and Forms I-94. SAVE uses this information to verify an individual's eligibility to be received public benefits, licenses, or credentials. Status Verifiers use ADIS as part of the secondary immigration status verification for SAVE.

- Central Index System (CIS): CIS contains information on the status of 57 million applicants/petitioners seeking immigration benefits to include: lawful permanent residents, naturalized citizens, U.S. border crossers, aliens who illegally entered the U.S., aliens who have been issued employment eligibility documents, individuals who petitioned for benefits on behalf of family members, and other individuals subject to the provisions of the Immigration and Nationality Act (INA). Status Verifiers will use CIS as part of the immigration status verification for SAVE.

- Computer-Linked Application Management Information System 3.0 (CLAIMS 3):
  CLAIMS 3 is a mainframe database centered major application that supports processing of USCIS applications and petitions for various immigrant benefits (e.g. change of status, employment eligibility, extension of stay, etc). It supports case management for and adjudication of all USCIS benefits except naturalization and citizenship. Status Verifiers will use CLAIMS 3 as part of the immigration status verification for SAVE.

- Computer-Linked Application Information Management System Version 4.0 (CLAIMS 4): CLAIMS 4 was developed by the Immigration and Naturalization Service (INS) to provide immigration status verification information and to assist in the processing applications related to naturalization or attaining U. S. citizenship. Status Verifiers will use CLAIMS 4 as part of the secondary immigration status verification for SAVE.

- Customer Profile Management System (CPMS): CPMS is the new repository of all digitized biometric data in USCIS. It stores biographic and biometric data used for Forms I-131 (Application for Travel Document); I-765 (Application for Employment Authorization); and I-551 (Alien Registration Card or Green Card). Status Verifiers will use CPMS as part of the immigration status verification for SAVE.

- Department of State Consular Consolidated Database (DOS-CCD): DOS-CCD is used by consular personnel as a resource for verifying prior visa issuances/refusals. It is also used by consular management for statistical reporting. Status Verifiers will use DOS-CCD as part of the secondary immigration status verification for the SAVE program. While the data from DOS-CCD will be used for verification, it will not be stored in VIS.

- ENFORCE Integrated Database (EID) Enforcement Alien Removal Module (EARM): EID contains biographic and case information on aliens encountered and booked in Immigration and Customs Enforcement (ICE) and other DHS component enforcement actions. Status Verifiers will use EID as part of the secondary immigration status verification for the SAVE program. Information from EID is required by the Status Verifiers to help determine whether an individual may not be eligible for employment, government benefit, credential, or other reason for which they are having their immigration status verified in the first place. DHS components collect the information in EID during enforcement or administrative actions. Its use for verification of immigration status follows because in all cases that the verification is performed, eligibility may be contingent on not having been the subject of an enforcement action.

- USCIS Enterprise Document System (EDMS): EDMS is a web-based system that allows users to view, search, and add comments to digitized immigration records or A-files. EDMS can consolidate digitized A-Files, while allowing users to display primary and secondary A-Files.

- Executive Office Immigration Review System (EOIR): This Department of Justice system contains information pertaining to aliens and alleged aliens brought into the immigration hearing process, including certain aliens previously or subsequently admitted for lawful permanent residence. Status Verifiers will use EOIR as part of the immigration status verification for the SAVE Program when there is a question of immigration status. Information from EOIR is required by the Status Verifiers in order to help determine whether an individual may be eligible for benefits, or other reasons for which they are having their immigration status verified in the first place. Its use for verification of immigration status follows because in all cases that the verification is performed, eligibility may be contingent on not having been the subject of an enforcement action.

- Marriage Fraud Amendment System (MFAS): The Marriage Fraud Amendment System (MFAS) supports and maintains casework resulting from the Immigration Marriage Fraud Amendment Act (MFA), which became law on November 10, 1986. MFAS allows users the ability to process and control applications and petitions to grant Conditional Permanent Resident (CPR) status and Permanent Resident (PR) status, and to identify and terminate the CPR status of aliens who acquired this status fraudulently or who have not removed this status during the designated time period that the law requires. Status Verifiers will use MFAS as part of the secondary immigration status verification for the SAVE program. While the data from MFAS will be used for verification, it will not be stored in VIS.

- Microfilm Digitization Application System (MiDAS): MiDAS is an image-based search and retrieval application of digitized alien records on individuals who entered the U.S. between 1906 and 1975 (50-60 million records). MiDAS allows the USCIS Office of Records to achieve a more effective search result and improved customer service. When digitization of all files is complete, the MiDAS database will hold over 80 million records including Master Index, Flex-O-Line, A-files,

Citizenship/Naturalization files (C-files, 129, 3904, OM, etc), file locator information cards, and other historical records. Status Verifiers will use MiDAS as part of the immigration status verification for SAVE.

- National File Tracking System (NFTS): NFTS provides a centralized, automated, mechanism for determining the location of a physical A-File and associated Receipt Files. NFTS supports the Records requirement to track files at the local level, as well as the national level. It is designed to support the Records mission and to provide efficient access to high-quality immigrant information by maintaining an accurate file inventory. Status Verifiers will use NFTS as part of the immigration status verification for the SAVE program in order to locate files.

- Refugees, Asylum, and Parole System (RAPS): RAPS contains biographic information collected for USCIS Form I-589, Asylum Application. Status Verifiers use RAPS as part of the secondary immigration status verification for SAVE. Information from RAPS is required by the Status Verifiers in order to help determine whether an individual is ineligible for employment. DHS components collect the information in RAPS when an applicant for asylum completes a Form I-589. Its use for verification of immigration status follows because asylum brings with it access to certain benefits.

- Reengineered Naturalization Applications Casework Systems (RNACS): RNACS provides full case tracking and management capability for naturalization casework including assignment of cases to Case Control Offices (CCO); queuing of cases for appropriate actions, scheduling interviews and oath ceremonies; editing transactions; reporting; and production of correspondence. Status Verifiers will use RNACS as part of the immigration status verification for SAVE.

- Student and Exchange Visitor Identification System (SEVIS): SEVIS maintains information on non-immigrant students and exchange visitors (F, M, and J Visas) and their dependents, and also on their associated schools and sponsors. SEVIS enables DHS to maintain current information and facilitate oversight relating to nonimmigrant foreign students and exchange visitors during the course of their stay in the U.S. SAVE accesses information from SEVIS and will use the information for primary verification of immigration status for SAVE. Status Verifiers will use SEVIS as part of the immigration status verification for SAVE.

Appendix C

Links to PIAs and SORNs of databases assessed by the SAVE Program
(Sorted by Commonly Used Name Acronyms)

- United States Visitor and Immigrant Status Indicator Technology (US-VISIT)'s Arrival Departure Information System (ADIS)
  - PIA: http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_usvisit_adis_2007.pdf
  - SORN: http://edocket.access.gpo.gov/2007/E7-16473.htm

- USCIS's Central Index System (CIS)
  - PIA: http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_uscis_cis.pdf
  - SORN: http://edocket.access.gpo.gov/2007/E7-375.htm

- USCIS's Computer-Linked Application Information Management System Version 3 (CLAIMS 3)
  - PIA: http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_cis_claims3.pdf
  - SORN: http://edocket.access.gpo.gov/2008/E8-22802.htm

- USCIS's Computer-Linked Application Information Management System Version 4.0 (CLAIMS 4)
  - PIA: http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_cis_claims4.pdf
  - SORN: http://edocket.access.gpo.gov/2008/E8-22802.htm

- USCBP's Nonimmigrant Information System and Border Crossing Information
  - PIA: http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_cbp_borderops.pdf
  - SORN: http://edocket.access.gpo.gov/2008/E8-17123.htm

- Department of State (DOS)'s Consular Consolidated Database (DOS-CCD)
  - PIA: http://www.state.gov/documents/organization/93772.pdf
  - SORNs:
    1) http://www.state.gov/documents/organization/102787.pdf
    2) http://www.state.gov/documents/organization/102790.pdf
    3) http://www.state.gov/documents/organization/102815.pdf

- ICE's ENFORCE Integrated Database (EID) Enforcement Alien Removal Module (EARM)
  - PIA: http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_ice_eid.pdf
  - SORN: http://edocket.access.gpo.gov/2010/2010-4099.htm

- USCIS's Enterprise Document Management System (EDMS)
  - PIA: http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_uscis_iddmp.pdf
  - SORN: http://edocket.access.gpo.gov/2007/E7-375.htm

- Department of Justice's Executive Office of Immigration Review System (EOIR)
  - PIA: http://www.justice.gov/opcl/eoir_pia.pdf
  - SORN: http://edocket.access.gpo.gov/2004/04-10564.htm

- USCIS's Image Storage and Retrieval System (ISRS)
  - PIA: http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_cis_bss.pdf
  - SORN: http://edocket.access.gpo.gov/2007/07-1643.htm

- USCIS's Marriage Fraud Amendment System (MFAS)
  - SORN: http://edocket.access.gpo.gov/2007/E7-375.htm

- USCIS's Microfilm Digitization Application System (MiDAS)
  - PIA: http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_cis_midas.pdf
  - SORN: http://edocket.access.gpo.gov/2007/E7-375.htm

- USCIS's National File Tracking System (NFTS)
  - PIA: Referenced in: 1) PIA titled: USCIS Person Centric Query Service Supporting Immigration Status Verifiers of the USCIS National Security and Records Verification Directorate/Verification Division http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_cis_pcq_nsrv_update.pdf and 2) Application Connection and Information Sharing Agreement between USCIS Enterprise Service Bus (ESB) and USCIS NFTS System Owner

- USCIS's Refugees, Asylum, and Parole System (RAPS)
  - PIA: http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_cis_rapsapss.pdf
  - SORN: http://edocket.access.gpo.gov/2010/E9-31267.htm

- USCIS's Reengineered Naturalization Applications Casework System (RNACS)
  - PIA: http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_cis_rnacs.pdf
  - SORN: http://edocket.access.gpo.gov/2008/E8-22802.htm

- Immigration and Customs Enforcement (ICE)'s Student and Exchange Visitor Identification System (SEVIS)
  - PIA: http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_sevis.pdf
  - SORN: http://edocket.access.gpo.gov/2010/E9-31268.htm

Privacy Impact Assessment Update
for the

Systematic Alien Verification for Entitlements Program

DHS/USCIS/PIA-006(a)

July 27, 2012

Contact Point
Brian C. Hobbs
Privacy Branch Chief, Verification Division
USCIS/Enterprise Services Directorate

Reviewing Official
Mary Ellen Callahan (b)(6)
Chief Privacy Officer
Department of Homeland Security

Abstract

The Department of Homeland Security (DHS), U.S. Citizenship and Immigration Services (USCIS), Verification Division is publishing this update to the Systematic Alien Verification for Entitlements (SAVE) Program Privacy Impact Assessment (PIA) dated August 26, 2011. SAVE is a fee-based inter-governmental initiative designed to help federal, state, tribal, and local government agencies confirm immigration status prior to the granting of benefits and licenses, as well as for other lawful purposes. The purpose of this update is to: (1) describe the new collection of foreign passport country of issuance (COI) from agencies issuing benefits and from the United States Visitor and Immigrant Status Indicator Technology (US-VISIT) Arrival and Departure Information System (ADIS);[1] (2) describe the addition of Enterprise Citizenship and Immigration Services Centralized Operational Repository (eCISCOR); (3) describe the decommissioning of the Image Storage and Retrieval System (ISRS) and replacement by the Customer Profile Management System (CPMS); and (4) describe the decommissioning of the Reengineered Naturalization Applications Casework System (RNACS) and replacement by Claims Linked Application Information Management System 4 (CLAIMS 4).[2]

Introduction

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

A federal, state, tribal, or local government agency that provides a public benefit or license, or that is otherwise authorized by law to engage in an activity related to the verification of immigration status, may enroll in SAVE as a customer agency. By using SAVE, federal, state, tribal, and local customer agencies can request immigration status information in order to make a determination regarding the applicant's eligibility for a benefit or a license. It is important to note that SAVE does not make determinations on an applicant's eligibility for a specific benefit or license, but it does provide the necessary information to the agencies to allow them to make an informed decision prior to issuing benefits or licenses. The customer agency analyzes the SAVE response against the agency's own eligibility criteria to make an award determination. SAVE does not know the final outcome of the benefit adjudication.[3]

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[1] See PIA at DHS/NPPD/USVISIT/PIA-005 Arrival and Departure Information System (ADIS) and updates and SORN at DHS/USVISIT-001 Arrival and Departure Information System 72 Fed. Reg. 47057 (August 22, 2007).
[2] See PIA at DHS/USCIS/PIA-015 Computer Linked Application Information Management System (CLAIMS4) and updates and SORN at DHS/USCIS-007 Benefits Information System 73 Fed. Reg. 56596 (Spetember 29, 2008).
[3] See the original SAVE Program PIA (DHS/USCIS/PIA-006) available at www.dhs.gov/privacy for additional information on the status verification process.

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

Country of Issuance

SAVE currently uses the I-94 number[4] as a primary identifier[5] to determine immigration status for non-immigrants. However, the U.S. Customs and Border Protection (CBP) is in the process of automating the I-94 system to increase efficiency and streamline the admission process for travelers to the United States. However, since SAVE depends on the integrity of the I-94 number and the automation effort is still underway, USCIS has proactively developed a new primary identifier that is independent of the I-94 process. SAVE will now have the capability to determine citizenship status using a combination of foreign passport number and COI. Combining these two data elements makes them a primary identifier. This enhancement requires new collection of COI from benefit applicants by the benefit granting agency. SAVE will compare this information with data in ADIS through an existing system interface. The collection of COI improves the efficiency of the verification process and addresses changes in the admission process for travelers.

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

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

eCISCOR

In situations where SAVE cannot automatically determine an applicant's immigration status, status verifiers will use eCISCOR[6] to manually verify the immigration status of benefit applicants. eCISCOR is a read-only database that consolidates immigration and naturalization information from several USCIS data systems. Verifying applicant information in eCISCOR improves the efficiency of status verifiers by allowing them to view data from multiple systems in one centralized repository. Status verifiers will use eCISCOR to verify an applicant's A-Number, name (last, first, middle), DOB, form numbers and Certificate of Citizenship number. The verification process is not changed by the use of eCISCOR.

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

[4] Form I-94 is a DHS form generally issued to aliens at the time they lawfully enter the United States. Form I-94 is used to document status in the United States, the length of stay, and departure.
[5] A primary identifier is a value that relates to a single person for the purpose of searching a database.
[6] The PIA for eCISCOR, Enterprise Citizenship and Immigration Services Centralized Operational Repository, is available at www.dhs.gov/privacy.

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

ISRS and CPMS

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

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

RNACS

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

Reason for the PIA Update

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

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

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

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

Privacy Impact Analysis

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

The System and the Information Collected and Stored within the System

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

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

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

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

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

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

Uses of the System and the Information

The SAVE program continues to check immigration status for granting benefits, licenses, and other lawful purposes as described in the previously published SAVE PIA (DHS/USCIS/PIA-006). This update creates no increased privacy impact. SAVE will now use the combination of foreign passport number and COI as a primary identifier to query the immigration status of individuals.

Retention

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

Internal Sharing and Disclosure

USCIS will continue to share and disclose information with DHS components for law enforcement purposes when SAVE detects possible fraud and/or misuse, on a case-by-case basis. The internal sharing and disclosure of this information remains consistent with the previously published SAVE PIA (DHS/USCIS/PIA-006).

External Sharing and Disclosure

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

Notice

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

Redress

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

Technical Access and Security

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

Technology

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

Responsible Official

Brian C. Hobbs
Privacy Branch Chief
Verification Division, U.S. Citizenship and Immigration Services
Department of Homeland Security

Approval Signature

_____

Mary Ellen Callahan
Chief Privacy Officer
Department of Homeland Security

Privacy Impact Assessment Update
for the

Systematic Alien Verification for Entitlements Program

DHS/USCIS/PIA-006(b)

April 19, 2013

Contact Point
Donald K. Hawkins
Privacy Officer
U.S. Citizenship and Immigration Services

Reviewing Official (b)(6)
Jonathan R. Cantor
Acting Chief Privacy Officer
Department of Homeland Security

Abstract

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

Overview

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

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

Reason for the PIA Update

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

Photo Matching Tool

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

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

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

With this update, the Photo Matching Tool is now available to all SAVE customer agencies, not only DMVs, in order to meet the demands for greater security in combating document fraud.[4] SAVE customer agencies can now indicate the desire to use the web interfacing Photo Matching Tool in their registration profile when enrolling in SAVE. If customer agencies select this option, they will now be able to confirm whether the photograph on a USCIS-issued identification card (e.g., the Permanent Resident Card or the Employment Authorization Card) an applicant presents is a match to the USCIS photograph on record returned by SAVE. SAVE will check the DHS Document Number[5] against the USCIS Central Index System (CIS)[6] to ensure it displays the correct photo with the applicant's record to reduce the risk of a photo mismatch.

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

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

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

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

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

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

Electronic Form G-845, Document Verification Request

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

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

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

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

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

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

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

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

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

Privacy Impact Analysis

The System and the Information Collected and Stored within the System

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

Uses of the System and the Information

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

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

Privacy Risks:

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

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

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

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

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

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

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

Retention

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

Internal Sharing and Disclosure

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

External Sharing and Disclosure

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

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

Notice

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

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

SAVE newsletters, training and the SAVE log-in screen. Additionally, the Federal Register, Volume 76, No. 102, May 26, 2011, provides notice of the implementation of the electronic G-845.[12]

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

Individual Access, Redress, and Correction

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

Individual Access:

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

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

Redress and Correction:

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

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

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

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

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

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

Technical Access and Security

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

Technology

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

Responsible Official

Donald K. Hawkins
Privacy Officer
U.S. Citizenship and Immigration Services
Department of Homeland Security
[redacted] (b)(6)

Approval Signature

Original signed and on file with the DHS Privacy Office.

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Jonathan R. Cantor
Acting Chief Privacy Officer
Department of Homeland Security

Privacy Impact Assessment

for the

Systematic Alien Verification for Entitlements "SAVE" Program

DHS Reference No. DHS/USCIS/PIA-006(d)

October 31, 2025

Homeland Security

Abstract

1. The abstract is the single paragraph that will be used to describe the program and the Privacy Impact Assessment.[1]

The U.S. Department of Homeland Security, U.S. Citizenship and Immigration Services, Verification Division administers the Systematic Alien Verification for Entitlements (SAVE) Program. The SAVE Program is an online inter-governmental service designed to help federal, state, territorial, tribal, local government agencies, benefit-granting agencies, other authorized entities and licensing bureaus, as authorized by law, determine citizenship and immigration status of individuals within their jurisdiction for the purpose of granting benefits, licenses, as well as for other lawful purposes. U.S. Citizenship and Immigration Services is publishing an update to this Privacy Impact Assessment to describe the collection, use, maintenance, and disclosure of personally identifiable information, as well as the risks associated with these updates. The purpose of this update is to discuss the changes to the tool, including: (1) documenting use of the tool for voter registration and voter maintenance list verification, (2) collection of Social Security numbers which may include those of U.S. born citizens for all benefit or license related uses of the program, (3) sharing of information between U.S. Citizenship and Immigration Services, the Social Security Administration, and the Department of State, (4) a new bulk upload feature for the program, and (5) reducing the fee for non-Federal government agencies.

Overview

2. The overview provides the context and background necessary to understand the **project's purpose and mission and the justification for operating a privacy** sensitive project.

The U.S. Citizenship and Immigration Services administers the SAVE Program. The SAVE Program is an online fee-based intergovernmental initiative designed to help federal, state, tribal, and local government agencies and licensing bureaus confirm immigration status information.[2]

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[1] Pursuant to Section 208 of the E-Government Act of 2002, agencies are required to conduct a Privacy Impact Assessment before developing or procuring Information Technology systems or projects that collect, maintain or disseminate information in identifiable form from or about members of the public. The Office of Management and Budget issued Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, which defines "information in identifiable form" as information in an Information Technology system or online collection: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements. Furthermore, an individual is defined as "a citizen of the United States or an alien lawfully admitted for permanent residence."

[2] It is the intent of the current Administration to provide more of a supporting role to state, local, tribal, and territory governments. The U.S. Department of Homeland Security has determined to better serve and support non-Federal

The SAVE Program provides status verifications to requesting federal, state, territorial, tribal, and local government agencies; benefit granting agencies; and other authorized entities and licensing bureaus. The U.S. Citizenship and Immigration Services (or a contractor acting on its behalf) will confirm immigration and/or United States citizenship status as authorized by law, to the extent that such disclosure is necessary to enable these agencies to make decisions. These decisions may relate to: (1) determining eligibility for a federal, state, or local public benefit; (2) issuing a license or grant; (3) issuing a government credential; (4) conducting a background investigation; (5) registering voters or developing/ managing voter maintenance lists; or (6) any other lawful purpose.

A federal, state, territorial, tribal, or local government agency that provides a public benefit or license, or that is otherwise authorized by law to engage in an activity related to the verification of immigration status, may enroll in the SAVE Program as a registered agency. By using the SAVE Program, federal, state, territorial, tribal, and local registered agencies can request immigration status information to determine the applicant's eligibility for a benefit or a license. It is important to note that the program does not make the determinations on an applicant's eligibility for a specific benefit or license or eligibility to vote (at the local, state, or national level). Instead, it provides immigration status information to agencies to allow them to make an informed decision prior to issuing benefits or licenses or denying voting benefits. The registered agency analyzes the SAVE Program's response against the agency's own eligibility criteria to make an award determination. The SAVE Program may not always know the outcome of the benefit adjudication.

The SAVE Program has access to multiple immigration record systems from government agencies to confirm immigration status. All SAVE Program-registered agencies must adhere to a Memorandum of Agreement or Computer Matching Agreement, which include binding responsibilities regarding proper information usage and handling. The Memorandum of Agreement also stipulates the terms for billing and payment, if applicable. As part of its billing and registration process, the SAVE Program collects personally identifiable information, such as the registered agency's point of contact name and professional contact information, as well as registered agency and demographic information. The SAVE Program staff may also collect sensitive information such as registered agency credit card information and other data relevant to the billing process from the federal, state, territorial, tribal, or local government agencies using the SAVE Program. The U.S Citizenship and Immigration Service collects, maintains, and safeguards this information in accordance with U.S. Department of Homeland Security privacy and information technology policies.

The U.S. Citizenship and Immigration Services is currently implementing a comprehensive

government agencies, by eliminating the fees for their use of the SAVE Program.

optimization of the SAVE Program. The U.S. Citizenship and Immigration Services has developed a phased approach to further the U.S. Department of Homeland Security mission. This Privacy Impact Assessment supports use of the SAVE Program for (1) voter registration and voter maintenance list verification; (2) collection of Social Security numbers, which may include those of U.S. born citizens for all benefit- or license-related uses of the program; (3) sharing of information between U.S. Citizenship and Immigration Services, the Social Security Administration, and the Department of State; (4) a new bulk upload feature for the program; and (5) removing the fee for non-Federal government agencies.

Social Security Administration Data Sharing

On January 20, 2025, and March 25, 2025, the President issued Executive Orders 14159, Protecting the American People Against Invasion and 14248, Preserving and Protecting the Integrity of American Elections respectively.[3] Executive Order 14159 includes a requirement for 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 and 8 U.S.C. 1644 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...."[4] Executive Order 14248 outlines that, "…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. And [Department of Homeland Security] is required to share database information with States upon request so they can fulfill this duty."[5] Executive Order 14248 directs the Secretary to "…ensure that State and local officials have, without the requirement of the payment 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 Department of Homeland Security is also required under Executive Order 14248, 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, alongside Federal immigration databases and State records requested, including through subpoena where necessary and authorized by law, for consistency with Federal requirements."

The Commissioner of Social Security also must assist states in determining whether individuals are eligible to register and vote by taking all appropriate action to make available the Social

[3] See Protecting the American People Against Invasion (January 2025) available at https://www.federalregister.gov/documents/2025/03/28/2025-05523/preserving-and-protecting-the-integrity-of-american-elections; and Preserving and Protecting the Integrity of American Elections (March 2025) available at https://www.federalregister.gov/documents/2025/01/29/2025-02006/protecting-the-american-people-against-invasion.

[4] 8 U.S.C.§ 1373; 8 U.S.C. §1644.

[5] 8 U.S.C. 1373(c).

Security Number Verification Service, the Death Master File, and any other Federal databases containing relevant information to all State and local election officials engaged in verifying the eligibility of individuals registering to vote or who are already registered.[6]

Most registered agencies may not have access in their voter, benefits, or licenses records to a U.S. Department of Homeland Security-issued identifier, (such as Alien Registration Number (Alien Number or A-number), Naturalization Certificate number, or Citizenship Certificate number) to initiate the initial SAVE Program query. To address this concern, the U.S. Citizenship and Immigration Services is incorporating a feature to allow SAVE Program-registered agencies to query records by Social Security numbers. Registered agencies will provide the U.S. Citizenship and Immigration Services with the individual's first and last name(s), date of birth and a full 9-digit or partial Social Security number. Registered agencies may additionally provide a U.S. Department of Homeland Security enumerator. The U.S. Citizenship and Immigration Services will provide the Social Security Administration with this information and in turn they will provide the U. S. Citizenship and Immigration Service with the following responses:

- Social Security number match (True/False);
- Name match (True/False);
- Date of birth match (True/False);
- Citizenship Indicator;
    - "A" - U.S. citizen;
    - "B" - Legal alien, eligible to work;
    - "C" - Legal alien, not eligible to work;
    - "D" – Other;
    - "E" - Alien student - restricted work authorized; and
    - "F" - Conditionally legalized alien.
- Foreign Born indicator (Citizenship code is not present, but individual was foreign born);
- State/Country code;
- American Samoa indicator (True/False);
- Alien Registration number (where applicable);

[6] Executive Order 14248 § 3(a).

- Death indicator (Yes / No); and
- Error code descriptions (transaction and record levels).

Of note, if a registered agency provides the names, dates of birth, and Social Security numbers of U.S. citizens by birth, the SAVE Program will maintain and process this information. For instance, a state may provide the U.S. Citizenship and Immigration Services information for all residents that are registered to vote within their jurisdiction. This would include U.S. citizens by birth. The U. S. Citizenship and Immigration Services will process this information as stated above and provide the appropriate response.

The SAVE Program now has a list processor feature to allow registered agencies to upload a list of individuals' case data instead of creating individual cases. A requesting agency, once signed into the program, will have an option to "upload" a list of individuals for the U.S. Citizenship and Immigration Services to verify citizenship and immigration status. Once uploaded, the SAVE Program creates individual cases for everyone identified on the uploaded list. The U. S. Citizenship and Immigration Services then sends from the list to the Social Security Administration the name, Social Security number, and date of birth of the individuals identified by the registered agency. The Social Security Administration then sends the status information (citizenship indicator noted above) back to the SAVE Program. The SAVE Program, if required, also queries other various systems (see below List of Federal Systems Used to Respond to Registered Agency Queries), and provides a consolidated result in each case file. The registered agency has the option of logging back into the program after twenty-four hours and searching for each case or generating a Web Agency Audit Report within the SAVE Program that can provide status information for multiple cases.

Additionally, program users will be able to download a list of individuals from the original list that the registered agency submitted, that the U.S. Citizenship and Immigration Services was not able to process. For example, a registered agency's list may not have a unique identifier for several individuals. To capture these incomplete cases, the program creates a spreadsheet that includes everyone who is not processed and requests additional information such as a Social Security number (corrected Social Security number), or Alien Registration Number. The registered agency can then update the spreadsheet provided with the additional information and upload it again into the program. The U.S. Citizenship and Immigration Services then provides the registered agency's account with the following information:

- Verification number (SAVE Program generated);
- 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); and
- Closed date.

Department of State Data Sharing

Registered agencies may provide either a U.S. passport number or a photocopy of a U.S. passport as documentation of citizenship or immigration status. If a U.S. passport number is submitted, the SAVE Program will verify it against information from U.S. Department of State-issued passport. Additionally, the SAVE Program will receive or access information in the U.S. Department of State's Consular Consolidated Database / American Citizen Record Query system, which is a consular search engine used by the U.S. 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.

State Driver's Licensing Agencies and Other Organizations Maintaining Driver's License Information Data Sharing

Within the U.S., driver's licenses are the most widely used form of identification. The SAVE Program can use driver's license and state identification card numbers to check and confirm identity information by working with state driver's licensing agencies and national agencies that store driver's license information for legal purposes (such as the National Law Enforcement Telecommunications System). When the registered agency provides a driver's license or state identification card number as the enumerator to verify the identity of the applicant, the SAVE Program will use state driver's licensing agencies or another source (such as the National Law Enforcement Telecommunications System) to validate the information and gain access to other government enumerators. This will allow the SAVE Program to match against other sources to verify immigration status and U.S. citizenship, which will improve accuracy and efficiency for SAVE registered agencies.

Auditing of Federal and State Oversight Programs Data Sharing

The SAVE Program will support organizations that have entered into required agreements with the U.S. Citizenship and Immigration Services and have a legal oversight authority over a program or benefit type supported by the SAVE Program through reporting capabilities for auditing purposes. User agencies with a legal authority to monitor and audit benefits granted may view case data such as biographic data, enumerators, case submission date/time, and the SAVE Program response information. Reporting options exist for individual agencies and their case data. Additionally, user agencies with legal authority may now be granted SAVE Program access to view other user agencies' case data through a linking mechanism based on either benefit type granted (e.g. Medicare) or by state. This new account type will have reporting options to view case data. Other account types enable user agencies to create cases within the SAVE Program to verify applicant current eligibility for benefits previously granted. This will allow federal and state oversight agencies to ensure user agencies are properly verifying immigration status or citizenship before making an eligibility determination. Oversight agencies can also ensure previously approved applicants remain eligible for the benefits they are receiving.

List of Federal Systems Used to Respond to Registered Agency Queries

The following is a list of federal information systems that the SAVE Program queries for responses to registered agencies:

United States Citizenship and Immigration Services Systems:

- Central Index System;[7]
- Electronic Immigration System;[8]
- Computer Linked Application Information Management System 3;[9]
- Enterprise Citizenship and Immigration Services Centralized Operational Repository;[10]
- GLOBAL (not an acronym);

[7] See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE CENTRAL INDEX SYSTEM, DHS/USCIS/PIA-009, available at Privacy Documents for USCIS | Homeland Security.

[8] See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE USCIS ELECTRONIC IMMIGRATION SYSTEM, DHS/USCIS/PIA-056, available at Privacy Documents for USCIS | Homeland Security.

[9] See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE COMPUTER LINKED APPLICATION INFORMATION MANAGEMENT SYSTEM AND ASSOCIATED SYSTEMS, DHS/USCIS/PIA-016, available at Privacy Documents for USCIS | Homeland Security.

[10] See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE ENTERPRISE CITIZENSHIP AND IMMIGRATIONS SERVICES CENTRALIZED OPERATIONAL REPOSITORY, DHS/USCIS/PIA-023, available at Privacy Documents for USCIS | Homeland Security.

- RAILS (not an acronym);[11]
- Customer Profile Management System;[12] and
- Salesforce Customer Relationship Management Customer Relationship Management.

Other U.S. Department of Homeland Security Systems:

- U.S. Department of Homeland Security OneNet;
- U.S. Immigration and Customs Enforcement Student and Exchange Visitor Program;[13]
- U.S. Immigration and Customs Enforcement, Enforcement Integrated Database;[14]
- U.S. Customs and Border Protection Arrival and Departure Information System;[15] and
- Transportation Security Administration Office of Intelligence and Analysis Technology Infrastructure Modernization Program.[16]

Other Federal Agency Systems:

- U.S. Military Entrance Processing Command Integrated Resource System;
- U.S. Department of Education Federal Student Aid Central Processing System;
- U.S. Department of Health and Human Services Centers for Medicare & Medicaid Services;
- U.S. Social Security Administration Numident system;
- U.S. Department of Justice Executive Office for Immigration's Immigration Review Information Exchange System;

[11] See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR RAILS, DHS/USCIS/PIA-075, available at Privacy Documents for USCIS | Homeland Security.

[12] See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE CUSTOMER PROFILE MANAGEMENT SERVICE, DHS/USCIS/PIA-060, available at Privacy Documents for USCIS | Homeland Security.

[13] See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT, PRIVACY IMPACT ASSESSMENT FOR THE STUDENT AND EXCHANGE VISITOR PROGRAM, DHS/ICE/PIA-001, available at Privacy Documents for ICE | Homeland Security.

[14] See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT, PRIVACY IMPACT ASSESSMENT FOR THE ENFORCEMENT INTEGRATED DATABASE, DHS/ICE/PIA-015, available at Privacy Documents for ICE | Homeland Security.

[15] See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CUSTOMS AND BORDER PROTECTION, PRIVACY IMPACT ASSESSMENT FOR THE ARRIVAL AND DEPARTURE INFORMATION SYSTEM, DHS/CBP/PIA-024, available at Privacy Documents for CBP | Homeland Security.

[16] See U.S. DEPARTMENT OF HOMELAND SECURITY, TRANSPORTATION SECURITY ADMINISTRATION, PRIVACY IMPACT ASSESSMENT FOR THE TRANSPORTATION SECURITY ADMINISTRATION OFFICE OF INTELLIGENCE AND ANALYSIS TECHNOLOGY INFRASTRUCTURE MODERNIZATION PROGRAM, DHS/TSA/PIA-042, available at Privacy Documents for TSA | Homeland Security.

- U.S. Department of State Consular Consolidated Database; and
- U.S. Department of State American Citizen Record Query System.

Fair Information Practice Principles

The U.S. Department of Homeland Security conducts Privacy Impact Assessments on developed or procured information technology systems involving the collection, maintenance, or dissemination of information in identifiable form or that make substantial changes to existing information technology that manages information in identifiable form, as required by Public Law 107-347, Section 208, "The E-Government Act of 2002," and any applicable and implementing Office of Management and Budget guidance; or proposed rulemakings affecting personal information as required by Section 222(a)(4) of the Homeland Security Act of 2002; or technologies that sustain, and do not erode, privacy protections relating to the use, collection, and disclosure of personal information pursuant to 6 U.S.C § 142(a)(1).

In response to these obligations, the U.S. Department of Homeland Security Privacy Office developed a set of Fair Information Practice Principles [17] from the underlying concepts of the Privacy Act of 1974[18] to encompass the full scope of the information and interactions of the U.S. Department of Homeland Security. The Fair Information Practice Principles account for the nature and purpose of the information being collected in relation to the U.S. Department of Homeland Security's mission to preserve, protect, and secure. The Fair Information Practice Principles are a set of eight principles that are rooted in the tenets of the Privacy Act.

3. What specific legal authorities and/or agreements permit the collection of information by the project in question?

In accordance with a 1986 Congress mandate, the U.S. Citizenship and Immigration Services, previously the Immigraton and Naturalization Service, established the SAVE Program to verify the citizenship and immigration status of individuals seeking government benefits for use by benefit granting agencies when making benefit determinations. The following provides authority for the program to collect, maintain, and share personally identifiable information:

- Immigration and Nationality Act, Public Law 82-414, 66 Statutory 163 (June 27, 1952);
- Homeland Security Act of 2002, Public Law Number 107-296, 116 Statutory 2135

[17] U.S. Department of Homeland Security, Privacy Policy Guidance Memorandum 2008-01, The Fair Information Practice Principles: Framework for Privacy Policy at the Department of Homeland Security (2008), available at https://www.dhs.gov/privacy-policy-guidance.

[18] Privacy Act of 1974, 5 U.S.C. § 552a, as amended.

(November 25, 2002);

- Immigration Reform and Control Act of 1986, Public Law 99-603, 11 Statutory 3359 (November 6, 1986);
- Personal Responsibility and Work Opportunity Reconciliation Act of 1996 , Public Law 104-193, 110 Statutory 2105 (August 22, 1996);
- Title IV, Subtitle A, of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, Public Law 104-208, 110 Statutoty 3009 (September 30, 1996);
- Real ID Act of 2005, Public Law 109-13, 119 Statutory 231 (May 11, 2005);
- Patient Protection and Affordable Care Act of 2010, Pub. L. No. 111-148, 124 Statutory 119 (Mar. 23, 2010), as amended by the Health Care and Education Reconciliation Act of 2010, Public Law 111-152, 124 Stat. 1029 (March 30, 2010);
- Federal Aviation Administration Extension, Safety and Security Act of 2016, Public Law 114-190, 130 Statutory 615 (July 15, 2016); and
- Social Security Act of 1935, Public Law 74–271, 49 Statutory 620 (Aug. 14, 1935) as amended, 42 U.S.C. § 1306.

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."

The Social Security Administration is aiding by sending to, and receiving, U.S. Department of Homeland Security and U.S. Citizenship and Immigration Services information regarding the citizenship or immigration status, lawful or unlawful, of individuals within its records. The Social Security Administration is authorized to participate in this information sharing under the authority of the Social Security Act, 42 U.S.C. § 1306, and pursuant to 8 U.S.C. § 1373(a).

4. Will this information be maintained as part of system of records,[19] as defined in the Privacy Act, 5 U.S.C. §552a?

[19] The term "system of records" means a group of any records under the control of any agency from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual.

Yes, information retrieved by the Social Security Administration, U.S. Department of State, and registered agencies will be maintained in the DHS/USCIS-004 Systematic Alien Verification for Entitlements (SAVE) Program System of Records.[20]

5. From which population does the project collect, maintain, use, and/or disseminate personally identifiable information?[21]

☒ a. Members of the public

☐ b. U.S. Department of Homeland Security employees and/or contractors

☐ c. Other federal employees

6. What personally identifiable information is collected, maintained, used, or disseminated?

The U.S. Citizenship and Immigration Services may collect the following information about aliens; legal permanent residents; and U.S. born, naturalized, and derived citizens from registered agencies:

- Name (last, first, middle);
- Unique identifiers;
  - Alien Regstriaton Number (Alien number or A-Number)/U. S. Citizenship and Immigration Services Number;
  - I-94 Arrival/Departure Record number;
  - Student and Exchange Visitor Information System Identification number;
  - Receipt number/card number;
  - Naturalized Certificate number; and
  - Citizenship Certificate number.

[20] See DHS/USCIS-004 Systematic Alien Verification for Entitlements, 90 Fed. Reg. 48948 (October 31, 2025), available at System of Records Notices | Homeland Security.

[21] Personally identifiable information means any information about an individual maintained by an agency, including, but not limited to, education, financial transactions, medical history, and criminal or employment history and information which can be used to distinguish or trace an individual's identity, such as their name, social security number, date and place of birth, mother's maiden name, biometric records, etc., including any other personal information which is linked or linkable to an individual. See OMB M-06-19, Reporting Incidents Involving Personally Identifiable Information.

- Visa or Passport (Foreign and/or United Sates) numbers;
- Social Security number or Individual Tax Identification Number;
- Driver's license or state identification number;
- Date of birth;
- Country of birth;
- Citizenship or nationality;
- Class of Admission code and Date of entry;
- File Control Office;
- Benefit sought; and
- Immigration documentation.

The United States Citizenship and Immigration Services shares the following information to the Social Security Administration about U.S. born, naturalized, and/or derived citizens:

- Name (last, first, middle);
- Date of birth;
- Social Security number (full and partial); and
- U.S. Department of Homeland Security-issued identifier (such as Alien Registration Number).

The U. S. Citizenship and Immigration Services maintains the following information from the Social Security Administration:

- Social Security number match (True/False);
- Name match (True/False);
- Date of birth match (True/False);
- Citizenship indicator;
    - "A" - U.S. citizen;
    - "B" - Legal alien, eligible to work;
    - "C" - Legal alien, not eligible to work;
    - "D" – Other;
    - "E" - Alien student - restricted work authorized; and

- "F" - Conditionally legalized alien.

- Foreign Born indicator (Citizenship code is not present, but individual was foreign born);
- State/country code;
- American Samoa indicator (True/False);
- Alien Registration Number (Alien Number or A-Number) (where applicable);
- Death indicator (Yes / No); and
- Error code descriptions (transaction and record levels).

The United States Citizenship and Immigration Services provides the following information to requesting agencies:

- Verification number (system generated);
- 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); and
- Closed date.

The U.S. Citizenship and Immigration Services shares the following information to the U.S. Department of State:

- Full name;
- Date of birth;

- Social Security number; and/or
- U.S. passport number.

The U.S. Citizenship and Immigration Services may maintain the following information from the U.S. Department of State:

- Full name;
- Date of birth;
- Certificate of Citizenship;
- Certificate of Naturalization;
- Alien RegistrationNumber (Alien Number or A-Number);
- U.S. passport book or passport card number;
- U.S. passport book or passport card issuance date;
- U.S. passport endorsement code(s) where applicable; and
- Images of U.S. passport book or passport card.

7. What is the intended use of personally identifiable information?

The SAVE Program uses personally identifiable information about individuals to help federal, state, territorial, tribal, and local government benefit-granting agencies, other authorized entities and licensing bureaus, as authorized by law, verify the citizenship and/or immigration status of individuals within their jurisdiction as they determine eligibility for benefits, credentials, and licenses; and verify voter registration. The U.S. Citizenship and Immigration Services also uses the personally identifiable information for federal security background investigations and other lawful purposes.

The U.S. Citizenship and Immigration Services uses a variety of data for cross-referencing. In this way, the U. S. Citizenship and Immigration Services ensures that data is accurate and current, identifies inconsistencies between or among databases, and minimizes fraud. Additionally, the U.S. Citizenship and Immigration Services collects personally identifiable information from individual users of the system to provide accountability of system usage in the event of misuse and abuse of the system. Further, the U. S. Citizenship and Immigration Services use personally identifiable information to register SAVE user agencies and other administration functions.

The U. S. Citizenship and Immigration Services will use the Social Security number from

requesting agencies to query the Social Security Administration Enumeration System to assist in providing U.S. citizenship or immigration status of individuals. Federal, state, local, tribal, and territory governments generally use the SAVE Program to assist in awards of benefits, voter registration verification, as well as identifying fraud.

The U.S. Citizenship and Immigration Services will compare U.S. passport information against information available in U.S. Department of State accessed systems to verify a match or no match. Using a passport number, the SAVE Program will be able to verify acquired or derived citizenship for individuals with a U.S. passport directly from the source records. Images of the U.S. Passport document may also be submitted by agencies when applicable to be used by status verifiers as part of the verification process. This ensures that personally identifiable information contained on the document can be used to verify the document and subsequently the citizenship status of the individual. Additionally, the U.S. Citizenship and Immigration Services will use U.S. passport application information, specifically, the Certificate or Citizenship or Certificate of Naturalization, to quickly verify citizenship status in certain cases and reduce its response time to registered users.

8. How long and under which retention schedule is the information retained?

Pursuant to the National Archives and Records Administration Authority N1-566-08-07, the U.S. Citizenship and Immigration Services maintains records within the SAVE Program for ten years from the date of the completion of the verification, unless the records are part of an ongoing law enforcement investigation in which case the U.S. Citizenship and Immigration Services may retain them until completion of the investigation.

9. With whom will personally identifiable information be shared?

☐ Within the Component/Office	Specify:
☒ Other-U.S. Department of Homeland Security Component(s)/Office(s)	Specify: When potential fraud or misuse is indicated by the SAVE Program information, this information may be shared, on a case-by-case basis, with U.S. Department of Homeland Security internal law enforcement organizations to include: • U.S. Immigration and Customs Enforcement; and • U.S. Customs and Border Protection.

☒ State, local, tribal, or territorial entities	Specify: A list of all requesting agencies and their purpose for accessing the SAVE Program is accessible at https://www.uscis.gov/save/save-agency-search-tool. Additionally SAVE may retrieve information from state driver's license and identification issuing agencies (such as Department of Motor Vehicles).
☐ Public	Specify:
☐ Private sector	Specify:
☐ Foreign governments	Specify:
☐ Foreign entities	Specify:
☒ Other:	Specify: Social Security Administration, U.S. Department of State, and National organizations maintaining driver's license and state identification information (such as the National Law Enforcement Telecommunications System).

10. How are individuals provided notice prior to the collection of information? If notice is not provided, explain why not.
Each registered agency completes a Memorandum of Agreement with the U.S. Citizenship and Immigration Services and agrees to provide notice to individuals within their jurisdiction of their use of information and sharing with the U.S. Citizenship and Immigration Services. Additionally, the U.S. Citizenship and Immigration Services provides notice through this Privacy Impact Assessment as well as system of records notices mentioned in Section 4. Each state holds the responsibility to provide notice of their use of information at the time of their collection or additional use of the information.

11. What opportunities are available for individuals to consent to uses, decline to provide information, or opt out?
The U.S. Citizenship and Immigration Services does not provide opportunities to individuals within the jurisdiction of the registered agency to consent to the U.S. Citizenship and Immigration Services use of their information. Pursuant to the above-mentioned legal authorities

listed in Section 3, the U. S. Citizenship and Immigration Services must provide individual information to the Social Security Administration and the U.S. Department of State to allow the Requesting Agency to determine the immigration status of applicants and registrants of benefits, licenses, or for voter registration verification. Each registered agency holds the responsibility to provide opportunities for consent of their use of individuals' information. Additionally, each registered agency holds the responsibility to determine whether an individual has a legal right to decline providing information to them based on applicable law.

12. What procedures are in place to allow individuals to correct inaccurate or erroneous information?

Individuals may request access to their information maintained by the U.S. Citizenship and Immigration Services by submitting a request at https://www.uscis.gov/records/request-records-through-the-freedom-of-information-act-or-privacy-act.

Requesters are required to provide their Alien Registration Number and/or full name, date, and place of birth, and return address.

Individuals should provide all written requests to contest or amend their information reviewed by the SAVE Program, with appropriate proof of identity, class of admission, and other relevant identifying information, as well as a statement about the incorrect. Depending on the originating source of information, the request may be satisfied within the U.S. Citizenship and Immigration Services, or the individual may be referred to the appropriate record holding agency. If the source of data is from a U.S. Citizenship and Immigration Services download and the SAVE Program confirms the data is incorrect, often by comparing the documents with the information in the program and cross-referencing other U.S. Citizenship and Immigration Services Verification Information System databases, the SAVE Program will contact the appropriate system owner recommending that the data be corrected.[22] Alternatively, the individual may make an appointment by calling the U.S. Citizenship and Immigration Services Contact Center at 800-375-5283 (TTY 800-767-1833). When appearing for the appointment, the person should provide accompanying supporting documentation, including proof of identity, class of admission, and other relevant identifying information. The SAVE Program customer agencies may change their profile information directly within the U.S. Citizenship and Immigration

[22] The Verification Information System is a composite information system incorporating data from various U.S. Department of Homeland Security and Social Security Administration databases and functions as the underlying information technology that supports the SAVE Program. The Verification Information System supports the U.S. Citizenship and Immigration Service's ability to verify whether a newly hired employee is authorized to work in the United States and the citizenship or immigration status verification of individuals seeking certain government benefits. The Verification Information System, including the services it houses, is in the Amazon Web Service cloud environment.

Services Verification Information System application. To correct typographic errors in your U.S. Citizenship and Immigration Services record or document, visit egov.uscis.gov/e-request.

13. What administrative, technical, and physical controls are used to protect the information?

The SAVE Program requires potential enrollees and customer agencies to register for participation in the program and sign an appropriate data sharing agreement. Once the enrollees submit the required documentation, all users must complete a web-based training course that explains functionality and security requirements.

The Systematic Alien Verification for Entitlements Program's internal users take the mandatory annual U.S. Department of Homeland Security Computer Security Training and the U.S. Citizenship and Immigration Services Privacy Awareness Training. Additionally, staff who administer the SAVE Program are required take special, role-based training. External SAVE Program users complete online tutorials. The tutorials also cover the procedures and policies associated with the use of the SAVE Program and includes privacy-related topics.

The Verification Information System, as the underlying technology supporting the SAVE Program has been Certified and Accredited and received a full authority to operate in April 2014. The system has been approved to participate in the Ongoing Authorization process and is continually monitored for compliance with the National Institute of Science and Technology policies to ensure compliance with the Federal Information System Management Act. The SAVE Program implements access controls for both internal and external customers, such as account names and passwords to access the program. The program has an automated mechanism to ensure that users change their passwords at specified intervals. Additionally, the program implements the following technical controls:

- Password data is encrypted within the system;
- The system is located within a multi-layered firewall architecture;
- The system follows a robust set of security controls that meet the U.S. Department of Homeland Security System Security Policy requirements. The certification and accreditation process ensures that the U.S. Citizenship and Immigration Services documents and verifies these security controls through the certification and accreditation process;
- The system uses secure hypertext transfer protocol protected communications during all data transmissions between the client workstation and the system;

- Passwords are encrypted when making database connections; and
- Procedures are in place to ensure that any potential breaches of information are reported within one hour of being found.

14. How does the Component ensure that personally identifiable information is used appropriately?

The SAVE Program has a comprehensive audit trail tracking and maintenance function that stores information about users who submit queries, when the query was processed, the query response, who received the query response, and when the user received the query response. The audit logs have restricted access based on user roles. These logs are external to system administration access methods and protected from modification. U.S. Citizen and Immigration Services personnel periodically review these audit logs to monitor user activity. Registered agencies must abide by all security requirements that they agreed to when they enrolled in the program. Attempts to evade the security controls can result in loss of access to the SAVE Program.

Some registered agencies use a single sign-on for all their individual users. In these cases, the SAVE Program will not collect information from individual users because individual users will appear as one agency user. In the case of single sign-on access to users, the U.S. Citizenship and Immigration Services requires the agency to sign an addendum to their Memorandum of Agreement which states that every user of the system must be assigned a unique identifier. If requested, the agency provides this information to the U.S. Citizenship and Immigration Services to allow for a clear audit trail for all transactions.

Associated Privacy Risks and Mitigations

Privacy Risk:	There is a risk that the U.S. Citizenship and Immigration Services may share inaccurate information with registered agencies, which could in turn impact a registered user agency's eligibility determination for an individual.
Mitigation:	The U.S. Citizenship and Immigration Services partially mitigates this risk. Generally, the SAVE Program has a 3-step process. The first step is a general query of the system. However, due to misspelling of names, transposed numbers, or incomplete information, the SAVE Program may produce inaccurate results. To mitigate this, the SAVE Program has a manual step process where a U.S. Citizenship and Immigration Services staff member will try to reconcile the request manually. The third step is for

	the U.S. Citizenship and Immigration Services to get additional documentation from the registered agency. However, this only partially mitigates the risk since the new request using Social Security numbers does not allow for a second and third step review. The U.S. Citizenship and Immigration Services does not have direct access to the Social Security Administration system to support these additional steps. Additionally, registered agencies may not go through all steps to ensure accuracy of information.

Privacy Risk:	There is a risk that all United States citizens, including natural born U.S. citizens, have not been provided notice that the SAVE Program collects or maintains their information for citizenship and immigration status.
Mitigation:	The United States Citizenship and Immigration Services partially mitigates this risk. It is the responsibility of each registered agency to provide notice to individuals within their jurisdiction of their use of information and sharing with the U.S. Department of Homeland Security/U.S. Citizenship and Immigration Services. The U.S. Citizenship and Immigration Services is publishing this privacy impact assessment and related System of Records Notice to provide transparency regarding the new categories of information collected and shared to assist registered agencies in verifying citizenship and immigration status of individuals applying for a benefit or license and voter registration verification. The SAVE Program's "Register an Agency for SAVE" explains how an eligible agency can create a Memorandum of Agreement with the U.S. Citizenship and Immigration Services. These agreements require registered user agencies to comply with the Privacy Act of 1974, 5 U.S.C. § 552a, as amended, and other applicable laws, regulations, and policies. These policies include transparency and notice to individuals regarding agencies collection and use of personally identifiable information.

Privacy Risk:	There is a risk that the U.S. Citizenship and Immigration Services may use the information it obtains from registered agencies, the Social Security Administration, and the U.S. Department of State, for purposes not authorized by statute or for which it was originally collected.
Mitigation:	The United States Citizenship and Immigration Services mitigates this risk by only collecting information as authorized by the Immigration and Naturalization Act and other authorities mentioned within this Privacy

	Impact Assessment. The purpose for sharing Social Security numbers with the Social Security Administration and receiving information is to allow user agencies to verify the citizenship or immigration status of individuals applying for a benefit, license, or voter registration verification. The purpose for sharing and receiving U.S. passport information with the U.S. Department of State is to verify the citizenship or immigration status of individuals applying for a benefit, license or for voter registration verification. Also, each registered agency must execute a Memorandum of Agreement or Computer Matching Agreement with the U.S. Citizenship and Immigration Services that includes terms that the SAVE Program will be used in accordance with the law.

Privacy Risk:	There is a risk that the new category individuals covered by this assessment/notice, specifically, United States born citizens do not have the opportunity to individually participate or consent in how the U.S. Citizenship and Immigration Services uses their information.
Mitigation:	The U.S. Citizenship and Immigration Services cannot mitigate this risk. Each user agency is responsible for complying with federal and local authorities. The U.S. Citizenship and Immigration Services assumes that each user agency factors in the principles of notice, individual participation, and consent prior to providing information to the U.S. Citizenship and Immigration Services. The U.S. Citizenship and Immigration Services only uses the information for the authorized purpose(s) identified within this Privacy Impact Assessment. Individuals should consult their local government agencies to determine the appropriate opt-in or opt-out statute, regulations and policies.

Privacy Risk:	There is a risk that individuals may access the SAVE Program that do not have a need to know of the information.
Mitigation:	The U.S. Citizenship and Immigration Services mitigates this risk by requiring the SAVE Program's potential enrollees and customer agencies to register for participation in the program and sign a Memorandum of Agreement or Computer Matching Agreement. After all required documentation is submitted, all users must complete a web-based training course that explains functionality and security requirements. The SAVE Program's internal users complete the mandatory annual privacy

	and information technology training. External program complete take on-line tutorials explaining the program. The tutorials also cover the procedures and policies associated with the use of the program.

Contact Official

Brian Broderick
Division Chief (Acting)
Verification Division
U.S. Citizenship and Immigration Services

Responsible Official

Angela Y. Washington
Component Privacy Officer
Office of Privacy
U.S. Citizenship and Immigration Services
U.S. Department of Homeland Security
[redacted]@uscis.dhs.gov (b)(6)

Approval Notice:

By signing below, the U.S. Department of Homeland Security Chief Privacy Officer approves this Privacy Impact Assessment for the SAVE Program. If, however, during the operational course of this program or U.S. Citizenship and Immigration Services' use of this technology changes from what has been documented or the U.S. Department of Homeland Security Privacy Office becomes aware of evidentiary changes to the intended use of the personally identifiable information or the scope of the personally identifiable information collected, of the program or technology is determined to be ineffective, the Chief Privacy Officer reserves the right to revoke approval of this Privacy Impact Assessment.

Approval Signature

Original, signed copy on file with the U.S. Department of Homeland Security Privacy Office.

_____

Roman Jankowski
Chief Privacy Officer
U.S. Department of Homeland Security
[redacted]@hq.dhs.gov

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Privacy Impact Assessment

for the

Systematic Alien Verification for Entitlements Program

DHS Reference No. DHS/USCIS/PIA-006(c)

June 30, 2020

Homeland Security

Abstract

The U.S. Department of Homeland Security (DHS), U.S. Citizenship and Immigration Services (USCIS), Verification Division administers the Systematic Alien Verification for Entitlements (SAVE) Program. SAVE is a fee-based inter-governmental initiative designed to help federal, state, tribal, and local government agencies confirm citizenship and immigration status prior to granting benefits and licenses, as well as for other lawful purposes. The purpose of this update is to discuss the changes to SAVE, including: (1) a new information collection, (2) the use of the Person Centric Entity Resolution microservice, (3) migration to a cloud-hosted environment, (4) transition from a paper-based process to a paperless process, and (5) to inform the public of USCIS's use of information from SAVE in administering bonds posted as security for performance and fulfillment of the financial obligations of a bonded alien (someone who is not a U.S. Citizen) to the U.S. Government. USCIS is publishing an update to this Privacy Impact Assessment (PIA) to describe the collection, use, maintenance, and disclosure of personally identifiable information (PII), as well as the risks associated with these updates.

Overview

The Systematic Alien Verification for Entitlements (SAVE) Program is a fee-based intergovernmental initiative that provides citizenship and immigration status to the extent that such information is necessary to enable federal, state, tribal, and local government agencies, benefit-granting agencies, private entities, institutions, and licensing bureaus (hereafter referred to as "user agencies") authorized by law to make decisions related to: (1) determining eligibility for a federal, state, tribal, or local public benefit; (2) issuing a license or grant; (3) issuing a government credential; (4) conducting a background investigation; or (5) any other lawful purpose. Uses of SAVE may include but are not limited to issuing Social Security benefits, unemployment benefits, education assistance, housing assistance, public health care, Supplemental Nutrition Assistance Program (SNAP) benefits, Temporary Assistance for Needy Families (TANF), Medicaid, Children's Health Insurance Program (CHIP), conducting background investigations, armed forces recruitment, REAL ID compliance, and other purposes authorized by law. SAVE does not provide determinations regarding an applicant's eligibility for a specific benefit or license; only the user agency can make that determination.

SAVE interacts exclusively with registered federal, state, tribal, or local government benefit-granting agencies, license granting agencies, and private entities, such as Airport Operators, seeking to verify the citizenship and immigration status of an immigrant, non-immigrant, and certain naturalized and derived U.S. citizens. All SAVE user agencies[1] are required to formalize the purpose and use in which they use SAVE through a Memorandum of Agreement

[1] The SAVE MOA and CMA templates define the parties and refer to the SAVE user as a "User Agency," even if the SAVE user is not, in fact, an agency.

(MOA) or Computer Matching Agreement (CMA). The MOA or CMA establishes the terms and conditions for the user agency's participation in SAVE. Those terms and conditions are binding responsibilities, which include proper usage and handling of SAVE information, using any information provided by SAVE solely for the purpose of determining the eligibility of persons applying for the benefit issued by the user agency, limiting use of such information in accordance with the MOA or CMA, and safeguarding the information that SAVE provides. SAVE also charges a fee based on the number and type of transactions that are conducted on behalf of the user agency.

SAVE Process

An individual (applicant) applies for a benefit (e.g., unemployment benefits, education assistance, housing assistance) directly with the user agency. The user agency works directly with the applicant to determine if he or she is eligible to receive the applicant's requested benefits or license. Using SAVE, the user agency submits an initial request based on the information provided by the applicant and is required to include a numeric identifier (e.g., Alien Number (A-Number), I-94 Arrival/Departure record number, Student and Exchange Visitor Information System (SEVIS) number,[2] or unexpired foreign passport number), first and last name, date of birth, passport country of issuance, and the benefit that the applicant is seeking. Using the information the user agency provides, SAVE begins the verification process. SAVE relies on the Verification Information System (VIS), the underlying information technology platform that maintains data from various U.S. Government databases and functions, to query DHS and other federal databases for records that match the benefit applicant's information.[3]

The SAVE verification process includes the following steps:

1. Initial Verification: The user agency submits an initial request based on the information provided by the applicant. The initial verification electronically compares information the user agency enters against DHS-accessed databases and returns a response within seconds. If a match is found, the response contains the individual's current citizenship and immigration status. If the applicant's citizenship and immigration status is confirmed, the verification process is complete. If a match is not possible, the user agency receives a response to institute additional verification (also referred to as "second step"). The user agency must

[2] The Student and Exchange Visitor Information System (SEVIS) is a web-based system for maintaining information on international nonimmigrant students and exchange aliens in the United States. The SEVIS number is issued to students for status verification purposes. For more information on SEVIS, please see DHS/ICE/PIA-001 Student and Exchange Visitor Information System (SEVIS), available at https://www.dhs.gov/publication/dhsicepia-001-student-exchange-visitor-information-system-sevis.

[3] For a list of data sources that VIS uses, see DHS/USCIS-004 Systematic Alien Verification for Entitlements Program System of Records, 85 FR 31798 (May 27, 2020).

click the "institute additional verification" button to begin the additional verification process. It does not occur automatically.

2. Additional Verification: The user agency has the option to submit additional information and/or attach a copy of the applicant's immigration documents to initiate a second step verification. Once the user agency submits the additional information (or submits the request without any additional information) for second level verification, a USCIS status verifier conducts an electronic or manual search of DHS databases, including databases not automatically searchable during the initial step. Within three (3) to five (5) federal working days, SAVE will return the applicant's status. If verification is still not possible, the system prompts the user agency to "Resubmit with Docs" and provide copies of the immigration document the applicant presented.
3. Third Level Verification: The third step of the SAVE verification process requires the user agency to scan and upload a copy of the applicant's immigration document, if not already provided during the additional verification step, to the Status Verification Operations Office to initiate a third level verification.

Reason for the PIA Update

USCIS is updating DHS/USCIS/PIA-006 and its subsequent updates to account for the following changes related to SAVE:

1. A new information collection about actions that agencies adjudicating federal means-tested public benefits take to deem sponsor income as part of applicant income for purposes of federal means-tested benefits eligibility and to seek reimbursement from sponsors for the value of benefits provided to sponsored applicants.
2. The use of the Person Centric Entity Resolution microservice,[4] which is designed to improve accuracy and efficiency of the existing SAVE automated verification process to determine if the information supplied by the user agency matches an identity in existing USCIS, DHS, and external source systems.
3. VIS migrated to a cloud-hosted environment.
4. SAVE transitioned from the paper Form G-845, Verification Request to a paperless, electronic process.
5. Use of information from SAVE in administering bonds posted as security for performance and fulfillment of the financial obligations of a bonded alien (someone who is not a U.S.

[4] A microservice is an approach to application development in which a large application is built as a suite of modular services. Each module supports a specific business goal and uses a simple, well-defined interface to communicate with other sets of services.

Citizen) to the U.S. Government.

Sponsor Deeming and Agency Reimbursement Information Collection

Section 212(a)(4) of the Immigration and Nationality Act (INA), 8 U.S.C. § 1182(a)(4) requires some immigrants who seek Lawful Permanent Resident (LPR) status to provide a Form I-864 or Form I-864EZ, Affidavit of Support Under Section 213A of the INA, referred to hereinafter as "Form I-864," executed by a sponsor. In certain cases, such as when a joint sponsor is needed, the intending immigrant may have more than one sponsor execute a Form I-864. In general, a sponsor must demonstrate that he or she can provide support to maintain the intending immigrant at an income of no less than 125 percent of the Federal Poverty Guidelines calculated based on the sponsor's household size during the period in which the Form I-864 is enforceable. Sponsors must sign the legally enforceable Form I-864, under which the sponsor agrees to assume financial support for the sponsored immigrant as well as liability for reimbursing the cost of any means-tested public benefits provided to the sponsored immigrant during the period in which the Form I-864 is enforceable. Sponsors can also include the income and assets of spouses or other eligible members of the sponsor's household if the household members execute a Form I-864A, Contract Between Sponsor and Household Member.

In determining a sponsored immigrant's eligibility for, and the amount of, any federal means-tested public benefits, the income and resources of any sponsor who executed a Form I-864 and any household member who executed a Form I-864A must be counted "notwithstanding any other provision of law," in accordance with 8 U.S.C. § 1631(a). Federal and state agencies administering federal means-tested public benefits refer to the counting of a sponsor's income and resources in determining an immigrant's eligibility as "deeming" – i.e., a sponsor's income and resources are said to be deemed to be income of the sponsored immigrant. State agencies have the responsibility to make determinations for exceptions to the sponsor deeming requirements. Benefit-granting agencies collect information about sponsor income and resources, as appropriate, in order to make accurate benefit award and deeming determinations.

Section 213A of the INA, 8 U.S.C § 1183a, also authorizes states to recover the costs of means-tested public benefits provided to sponsored immigrants from sponsors who have signed a Form I-864, or from household members who executed a Form I-864A, during the time period that the respective forms are in effect. In pursuing reimbursement of benefits from an immigrant's sponsor, states must follow the process set out by DHS regulations, which, in particular, permits agencies to request "information through the Systematic Alien Verification for Entitlement (SAVE) Program...to obtain the sponsored immigrant's current immigration or citizenship status or the name, Social Security number and last known address of a sponsor, substitute sponsor, or joint sponsor." SAVE provides financial sponsor information through Form I-864 or Form I-864EZ and household member information through Form I-864A to SAVE user agencies that adjudicate one or more of the five federal means-tested public benefits: Medicaid, CHIP, TANF,

SNAP, and supplemental security income (SSI). SAVE provides this information which will enable deeming and reimbursement actions.

The five federal means-tested benefits are administered at the federal level as follows: (1) Health and Human Services, Centers for Medicare and Medicaid Services – Medicaid (HHS/CMS – Medicaid); (2) HHS/CMS – CHIP; (3) HHS, Administration for Children and Families – TANF (HHS/ACF – TANF); (4) U.S. Department of Agriculture, Food and Nutrition Service – SNAP (USDA/FNS – SNAP); and (5) Social Security Administration SSI (SSA – SSI). SSA adjudicates SSI applications. State agencies under federal rules adjudicate the four other federal means-tested benefits (i.e., SNAP, TANF, CHIP, and Medicaid).

Although SAVE provides citizenship and immigration status information to approved and configured user agencies, SAVE currently does not collect benefit determination information. In particular, when SAVE provides immigrant sponsorship information to user agencies for deeming and reimbursement processes governed by the INA, Section 213A, 8 C.F.R. 213a, and other federal rules, SAVE does not currently prompt a response from those agencies as to their use of that information in determining the benefit. Because SAVE does not collect information regarding benefit determinations, the federal government currently has little visibility into whether and how benefit-granting agencies use the sponsor and household member information that SAVE provides for the deeming and reimbursement processes governed by INA, Section 213A, 8 CFR 213a, 8 U.S.C. 1631, and other federal laws, regulations, and guidance. SAVE also currently has limited visibility into whether benefit-granting agencies are following the terms of their MOA or CMA with SAVE and other SAVE rules in how they use Form I-864 sponsor and Form I-864A household member information. Furthermore, a Government Accountability Office (GAO) report observed that SAVE needs to improve the overall effectiveness of its monitoring and compliance activities.

The recent Presidential Memorandum (PM), Memorandum on Enforcing the Legal Responsibilities of Sponsors of Aliens, issued on May 23, 2019, placed a renewed focus on adequately enforcing reimbursement and deeming requirements, observing that "some agencies have insufficient procedures and guidance for implementing these reimbursement and deeming requirements of the immigration laws."[5] The PM directed the Secretary of Homeland Security, in particular, to ensure that the agency efficiently and effectively establishes and maintains records regarding each financial sponsor's reimbursement obligations and status. The PM further details requirements related to data collection when determining eligibility for certain sponsored immigrants who seek federal means-tested public benefits and directs federal agencies to take steps necessary to ensure compliance with requirements under the INA and other applicable federal

[5] See https://www.whitehouse.gov/presidential-actions/memorandum-enforcing-legal-responsibilities-sponsors-aliens/.

laws.

SAVE is amending its processes in response to the GAO report, the PM, and to help determine the extent to which benefit-granting agencies are complying with governing SAVE and federal deeming and reimbursement laws, rules, and regulations. When sponsorship information is provided to the user agency, SAVE will request the benefit-granting agency's final determination on adjudication of the federal means-tested public benefit. SAVE is requesting the collection of information regarding actions that agencies adjudicating federal means-tested public benefits take to (1) deem sponsor income as part of applicant income for purposes of federal means-tested benefits eligibility[6] and (2) seek reimbursement from sponsors for the value of benefits provided to sponsored applicants. The information may include:

- Whether the benefit-granting agency approved or denied the application for the means-tested public benefit;
- If the benefit-granting agency denied the application, whether the denial was based upon the information that SAVE 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; and
- Whether the benefit-granting agency conducted a collection action or other proceeding 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).

This information will provide greater visibility into whether and how benefit-granting agencies use the sponsor and household member information that SAVE provides for the deeming and reimbursement processes.

SAVE will request and collect sponsor deeming and agency reimbursement information for each case that it provides sponsor information as part of the SAVE response. SAVE plans to collect this data for each case in which SAVE provides Form I-864 sponsor information. The information collection and maintenance will be day-forward, for federal means-tested public

[6] Under Section 421 of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (8 U.S.C. 1631), agencies adjudicating federal means-tested public benefits must consider ("deem") the income and assets of a qualified sponsor who has completed a Form I-864 or Form I-864EZ, Affidavit of Support (collectively referred to herein as a "Form I-864"), or a qualified household member who has completed a Form I-864A, Contract Between Sponsor and Household Member, as available to the sponsored benefit applicant in determining whether he or she is eligible for certain federal means-tested public benefits.

benefit applications adjudicated (e.g., approved, denied) on or after the date the benefit-granting agency begins providing sponsor deeming and reimbursement data to SAVE. SAVE will not collect information for federal means-tested public benefit applications the benefit-granting agency approves prior to that date.

Some state health care agencies submit immigration status requests to and receive responses from SAVE through the Health and Human Services, Centers for Medicare and Medicaid, Federal Data Services Hub Verify Lawful Presence service (VLP service). Responses through the VLP service sometimes include sponsor information. The sponsor deeming and agency reimbursement information collection functionality will not be available through the VLP service. Therefore, for agencies that are participating in the information collection and receive sponsor information for a SAVE case through the VLP service, SAVE will create and place a derivative copy of the subject case in a separate account that the same user agency may use to connect directly with SAVE. The agency will then provide the sponsor deeming and agency reimbursement information collection using the derivative case rather than the original case transmitted through the VLP service. If an agency does not already have a separate account for connecting directly to SAVE, SAVE will create one for that agency, which will include the agency signing a Memorandum of Agreement with SAVE if they do not already have one.

SAVE will now have greater visibility into whether and how benefit-granting agencies use the sponsor and household member information that SAVE provides for the deeming and reimbursement processes. SAVE will also have greater visibility into whether benefit-granting agencies are following the terms of their MOA or CMA with SAVE and other SAVE rules in how the benefit-granting agency uses Form I-864 sponsor and Form I-864A household member information.

With this information, USCIS intends to compile and make reports available to federal means-tested public benefit agencies that perform oversight, monitoring, and compliance activities regarding federal deeming and reimbursement rules. These reports will consist of general statistics in addition to case-specific information (which will include PII related to applicants who apply for the federal means-tested benefit that the agency oversees), so that federal means-tested public benefit oversight and administrative agencies can see individual cases that did not complete sponsor deeming and/or those cases where the benefit was not provided due to deeming. These reports will also be made available to the Department of Justice and the Department of Treasury, as necessary and authorized by law, and in coordination with the federal means-tested public benefit agencies for reimbursement activity. USCIS will further provide access, as appropriate and at USCIS's discretion, to relevant reports to approved adjudicating SAVE user agencies to assist them in managing their SAVE cases and monitoring their own compliance with SAVE program rules and the federal deeming and reimbursement rules.

Person Centric Entity Resolution Microservice

USCIS is developing the Person Centric Services (PCS) in order to move USCIS towards the person-centric approach.[7] PCS is a series of microservices, which are integrated within existing USCIS systems to improve how USCIS handles, stores, and leverages person-centric data by providing personnel and systems with a repository of highly reliable and complete person records. PCS will support the management of the identities of USCIS customers by performing data analysis using the available data and the resolution of identities across systems. PCS provides highly reliable person identities for the USCIS applicants and petitioners that facilitate identity management services. PCS will be implemented in incremental phases. One of the first microservices to deploy is the Person Centric Entity Resolution microservice as an enhancement to SAVE.

The Person Centric Entity Resolution microservice is designed to improve accuracy and efficiency of the SAVE automated verification process for comparing data supplied by the user agency to what exists in USCIS, DHS, and external systems in order to determine an applicant's citizenship and immigration status. The former verification process for VIS was a distributed architecture in which VIS aggregated and compared data from multiple systems for SAVE and relied on the receipt of nightly downloads of data. If any of the systems used by SAVE were down, cases were sent to the Status Verification Operations Office to manually validate information against multiple DHS-accessed systems.

With the implementation of the Person Centric Entity Resolution microservice, SAVE relies on the microservice as a single source. The Person Centric Entity Resolution microservice improves how SAVE verifies citizenship and immigration status by reconciling data in a new, highly optimized manner. Instead of VIS relying on individual systems for each citizenship and immigration status verification case, VIS interfaces with the Person Centric Entity Resolution microservice as a single source to automatically compare the data provided by the user agency against the same USCIS, other DHS, and external system data sets for the automated verification process. This results in faster response times to user agencies and a reduction of the number of second step additional verifications;[8] and therefore, a reduction in the number of third level verifications. By leveraging this improved data, SAVE can quickly deliver more accurate results to user agencies.

SAVE's use of the Person Centric Entity Resolution microservice does not change the overall citizenship and immigration status verification process for USCIS or the user agency. The Person Centric Entity Resolution microservice supporting SAVE continues to access the same data

[7] The forthcoming Person Centric System PIA will be available at www.dhs.gov/privacy.

[8] Additional verification is necessary in some instances where status cannot be verified through the first step. This does not mean that the applicant is not authorized to be in the United States, or is ineligible to receive the benefit. A second step verification query may take up to three (3) – five (5) working days to generate a response.

from the same systems as VIS. However, the Person Centric Entity Resolution microservice now retrieves that information through a direct connection to USCIS source systems, as well as through the Enterprise Citizenship and Immigrations Services Centralized Operational Repository (eCISCOR)[9] and Enterprise Service Bus 2 (ESB 2).[10] The Person Centric Entity Resolution microservice retrieves, consolidates, and caches data from the following systems on a daily basis:

USCIS Systems

- Customer Profile Management System (CPMS)[11]
- USCIS Electronic Immigration System (USCIS ELIS)[12]
- Central Index System (CIS 2)[13]
- Computer-Linked Application Information Management System 4 (CLAIMS 4)[14]
- Global (not an acronym)[15]

The following systems send information via eCISCOR:

- Computer-Linked Application Management Information System 3 (CLAIMS 3)[16]
- Reengineered Naturalization Application Casework System (RNACS)[17]
- RAILS (not an acronym)[18]

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[9] See DHS/USCIS/PIA-023(a) Enterprise Citizenship and Immigrations Services Centralized Operational Repository (eCISCOR), available at https://www.dhs.gov/publication/dhs-uscis-pia-023a-enterprise-citizenship-and-immigrations-services-centralized.

[10] See DHS/USCIS/PIA-008(a) Enterprise Service Bus, available at https://www.dhs.gov/publication/dhsuscispia-008-enterprise-service-bus-2-esb-2.

[11] See DHS/USCIS/PIA-060 Customer Profile Management Service (CPMS), available at https://www.dhs.gov/publication/dhsuscispia-060-customer-profile-management-service-cpms.

[12] See DHS/USCIS/PIA-056 USCIS ELIS, available at https://www.dhs.gov/publication/dhsuscispia-056-uscis-electronic-immigration-system-uscis-elis.

[13] See DHS/USCIS/PIA-009(a) Central Index System (CIS), available at https://www.dhs.gov/publication/dhsuscispia-009-central-index-system.

[14] See DHS/USCIS/PIA-015 Computer Linked Application Information Management System (CLAIMS 4), available at https://www.dhs.gov/publication/dhsuscispia-015b-computer-linked-application-information-management-system-4-claims-4.

[15] See DHS/USCIS/PIA-027(c) USCIS Asylum Division, available at https://www.dhs.gov/publication/dhsuscispia-027b-refugees-asylum-and-parole-system-and-asylum-pre-screening-system.

[16] See DHS/USCIS/PIA-016(a) CLAIMS 3 and Associated Systems, available at https://www.dhs.gov/publication/dhsuscispia-016-computer-linked-application-information-management-system-claims-3-and.

[17] RNACS decommissioned data is available in eCISCOR. See DHS/USCIS/PIA-023(a) Enterprise Citizenship and Immigrations Services Centralized Operational Repository (eCISCOR), available at https://www.dhs.gov/publication/dhs-uscis-pia-023a-enterprise-citizenship-and-immigrations-services-centralized.

[18] RAILS is only used for assistance in linking consolidated A-Numbers and links between A-Numbers and Receipt numbers. No biographic information is contained in this system, and no data from RAILS is directly passed to

DHS Systems Customs and Border Protection (CBP)

- Arrival and Departure Information System (ADIS)[19]
- Nonimmigrant Information System (NIIS)[20]

External Systems via USCIS ESB 2

- Department of Justice (DOJ) Executive Office for Immigration Review (EOIR) Immigration Retrieval and Information Exchange System (IRIES)[21]

Under the enhanced verification process, when SAVE verifies an individual's citizenship and immigration status, VIS communicates with the Person Centric Entity Resolution microservice to instantaneously access the same data from all systems as opposed to checking each system one by one for a match. The Person Centric Entity Resolution microservice then applies algorithms to determine a match confidence level, which is a measurement of the level of confidence in the match between the information submitted by the user agency and the information received from the data sources. The Person Centric Entity Resolution microservice algorithms enable the resolution and aggregation of multiple un-linked identity records (and associated data) to form a singular, comprehensive, and high-confidence view of an individual; thus, making the citizenship and immigration status verification matching process more reliable.

Additionally, because the Person Centric Entity Resolution microservice caches[22] all the necessary data, SAVE has a reduced dependency on other systems' availability. SAVE's use of the Person Centric Entity Resolution microservice has significantly improved SAVE reliability and speed by accessing the same data from all USCIS, DHS, and external systems instantaneously (as the systems can be queried by the Person Centric Entity Resolution microservice at the same time) as opposed to checking each system one by one for a match. SAVE makes a more precise search since the Person Centric Entity Resolution microservice associates the data it has queried from USCIS, DHS, and external source systems in a way to make the citizenship and immigration status verification process more accurate.

SAVE users or to VIS. RAILS can be used by USCIS employees to find the A-Files. See DHS/USCIS/PIA-075 RAILS, available at https://www.dhs.gov/publication/dhsuscispia-075-rails.

[19] See DHS/CBP/PIA-016 I-94 Website Application and DHS/CBP/PIA-024 Arrival and Departure Information System, available at https://www.dhs.gov/publication/us-customs-and-border-protection-form-i-94-automation and https://www.dhs.gov/publication/arrival-and-departure-information-system.

[20] NIIS is a subsystem housed on the CBP TECS platform; see DHS/CBP/PIA-021 TECS System: Platform (August 2016), available at https://www.dhs.gov/publication/dhscbppia-021-tecs-system-platform.

[21] See Case Access System for EOIR (CASE), available at www.justice.gov/opcl/doj-privacy-impact-assessments.

[22] Note that "caching" does not introduce a new lag in the data because the data are being replicated in real-time from the same sources, or VIS is receiving the data faster because nightly (24 hour delayed refresh) processes are eliminated by direct interfaces.

Migration to Cloud-based Platform

USCIS is undergoing a system modernization effort.[23] To support this modernization effort, USCIS is shifting away from traditional Data Centers to the use of third-party cloud-hosted environments. USCIS migrated VIS to the Amazon Web Services (AWS) cloud platform. This migration does not impact the collection and use of PII in VIS. USCIS requires AWS to segregate VIS data from all other third-party data. All existing records from VIS were extracted from the legacy database and transferred to the new cloud environment. This technological advancement does not affect the collection and use of records in VIS but modifies the way USCIS stores and maintains records related to SAVE as further discussed in the Auditing and Accountability section of this PIA.

SAVE Paperless Processing

SAVE has transitioned from the paper Form G-845, Verification Request, to an essentially paperless, electronic process. The SAVE paperless initiative is part of a larger effort by USCIS to eliminate paper-based forms, as the agency transitions to online submission of benefit requests. Transitioning to a paperless process will eliminate 170,000 paper form submissions and returned responses annually, reducing resource costs and postal fees. The paperless initiative does not include creating an electronic Form G-845 as user agencies will now electronically submit the required information through SAVE instead of a paper-based form.

As stated previously, if SAVE is unable to locate a record pertaining to the applicant, the user agency is able to initiate additional verification. If the second step search produces relevant information enabling verification of citizenship and immigration status, SAVE provides an electronic notice to the user agency. However, if SAVE is still unable to locate a record for the applicant during the second step, SAVE electronically requests the user agency to submit a copy of the applicant's immigration documents for a third step search. Previously, user agencies had the option to mail in the Form G-845. Through SAVE modernization, all citizenship and immigration status verification requests are now submitted, completed, and responses returned electronically. While there is no electronic Form G-845, user agencies can request the same information electronically using SAVE as they used to via the paper Form G-845. User agencies also scan and upload copies of the applicant's immigration document, as needed. The paperless process has decreased the time it takes for agencies to receive second and third-level verification responses, as the process is more streamlined and efficient.

SAVE still provides a paper-based verification method; however, it is only appropriate for agencies to use the paper-based Form G-845 in extraordinary situations as determined by SAVE. Submissions of paper-based Form G-845 verification requests without prior approval by SAVE

[23] USCIS is undergoing a system modernization effort to align with the Cloud Smart initiative. Cloud Smart is a new strategy for agencies to adopt cloud solutions that streamline transformation and embrace modern capabilities.

will be rejected. When approved, user agencies may submit a request to verify an applicant's citizenship and immigration status by mailing a Form G-845 with photocopies of the front and back of the applicant's immigration document(s) to a designated Status Verification Operations Office.

Administration of USCIS Bonds

In certain cases where an alien is determined to be inadmissible, but is otherwise admissible, he or she may be admitted at the discretion of the Secretary of Homeland Security upon the giving of a suitable and proper bond.[24] USCIS uses the Form I-945, Public Charge Bond to collect information to provide for the posting, maintenance, cancellation, and breach determination of a bond, and for the associated financial management activities, including collection of unpaid monies, and the calculation, payment, and reporting of interest.[25] USCIS will only exercise this authority in the context of adjustment of status applications in cases where adjustment would otherwise be granted but for these grounds of inadmissibility.

USCIS will use information from SAVE as part of administering these bonds. Specifically, USCIS will use information from SAVE as a way of learning whether a bonded alien (i.e., the alien on whose behalf the bond has been posted) may have applied for and/or received certain public benefits, as defined in 8 CFR 212.21(b). An application for these public benefits is not an indication of a bond breach in and of itself, but acceptance of a public benefits for more than 12 months in the aggregate within any 36-month period (such that, for instance, receipt of two benefits in one month counts as two months), after the alien's adjustment of status until the bond is cancelled pursuant to 8 CFR 213.1(g), may constitute a breach.

If a bonded alien was the subject of a SAVE immigration status verification request for one or more public benefits, as defined in 8 CFR 212.21(b), during the governing time frame, SAVE will supply certain data to the USCIS ELIS-based repository of bond information. The data from SAVE will include agency name, type of benefit (i.e., Medicaid, SSI, etc.), and the benefit requestor's full name, date of birth, and immigration identifier (i.e., A-number or other numeric identifier that the requestor supplied to the benefit-granting agency). The data from SAVE will also include any available sponsor deeming and agency reimbursement information. USCIS personnel will then consult the USCIS ELIS-based repository in the course of determining whether a bond breach has occurred. SAVE will provide this data annually, whenever the bonded alien requests cancellation of their bond, and as otherwise needed for bond administration.

[24] INA 212(a)(4) and 213; and 8 CFR 103.6 and 213.1.
[25] https://www.uscis.gov/i-945.

Privacy Impact Analysis

Authorities and Other Requirements

The previously cited legal authority to operate SAVE has not changed with this update. SAVE itself is established, administered and operated pursuant to the Immigration Reform and Control Act of 1986, Pub. L. No. 99-603, 100 Stat. 3359, Part C, § 121(c) (Nov. 6, 1986), codified at 42 U.S.C. § 1320b-7(d)(3) and note, Section 102 of the Homeland Security Act of 2002, 6 U.S.C. § 112, and section 103 of the Immigration and Nationality Act, 8 U.S.C. § 1103, which vest the Secretary of Homeland Security with administration of the immigration and naturalization laws of the United States. SAVE and SAVE user agencies also verify citizenship and immigration status pursuant to the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Pub. L. No. 104-193, 110 Stat. 2105 (Aug. 22, 1996) (codified at 8 USC §§ 1621-1625); the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, Pub. L. No. 104-208, 110 Stat. 3009-546, § 642 (Sept. 30, 1996) (codified at 8 U.S.C. § 1373); the REAL ID Act of 2005, Pub. L. No. 109-13, 119 Stat. 231, 302 (May 11, 2005), as implemented by 6 C.F.R. 37.13(b)(1); the Patient Protection and Affordable Care Act, Pub. L. No. 111-148, 124 Stat. 119 at § 1411(a)(1) (Mar. 23, 2010), as amended by the Health Care and Education Reconciliation Act of 2010, Public Law 111-152, 124 Stat. 1029 (Mar. 30, 2010); and the FAA Extension, Safety and Security Act of 2016, Pub. L. No. 114-190, 130 Stat. 615, § 3405(d) (July 15, 2016). These authorities give USCIS the legal authority to operate a system for verification of citizenship and immigration status of individuals seeking government benefits. There is no change in the requirement that all user agencies participating in SAVE sign a MOA or CMA with SAVE.

SAVE collects and shares sponsorship information for sponsor deeming and agency reimbursement purposes under the authorities cited above and Section 213A of the Immigration and Nationality Act, Public Law 82-414, 66 Stat. 163 (1952), as amended, and 8 U.S.C. § 1631.

USCIS administers bond processes pursuant to Section 212(a)(4) and 213 of the Immigration and Nationality Act, as implemented in 8 CFR 103.6, 212.21 and 213.1.

The SAVE SORN,[26] continues to cover the collection, maintenance, and use of the information for the enhanced automated citizenship and immigration status verification process. A revised version of the SORN is being published concurrently with this PIA to expand the categories of records in the system to include information collected from benefit-granting agencies adjudicating federal means-tested public benefits about actions taken to deem sponsor income as part of applicant income for purposes of federal means-tested benefits eligibility and to seek reimbursement from sponsors for the value of benefits provided to sponsored applicants. The new collection of information is still compatible with the purpose of the SAVE SORN because the

[26] See DHS/USCIS-004 Systematic Alien Verification for Entitlements Program System of Records, 85 FR 31798 (May 27, 2020).

collection and use of information enhances the integrity of SAVE and improves these processes by providing visibility into whether and how benefit-granting agencies use the sponsor and household member information that SAVE provides for the deeming and reimbursement processes.

This update does not change the Authority to Operate (ATO) for VIS, the technology that supports SAVE. VIS was approved for operation on April 28, 2014, and is part of the Ongoing Authorization program. Ongoing Authorization requires VIS to be reviewed on a monthly basis to ensure compliance with security and privacy requirements in order to maintain its ATO.

The records schedule does not change with this update. The National Archives and Records Administration (NARA)-approved records retention and disposal schedule, N1-566-08-07, continues to cover SAVE records. VIS stores and retains records collected in the process of enrolling in SAVE and in verifying citizenship and immigration status for ten (10) years from the date of the completion of verification, unless the records are part of an ongoing investigation in which case they will be retained until completion of the investigation.

The Form G-845, Verification Request, is covered by the Paperwork Reduction Act, specifically, OMB Control number 1615-0101. Furthermore, USCIS is updating the Form G-845 supplement to add the new sponsor deeming and agency reimbursement information collection.

Characterization of the Information

Collecting sponsor deeming and agency reimbursement information, including for purposes of administrating the bond process, is a new information collection for SAVE. The Person Centric Entity Resolution microservice, VIS migration, and transition to paperless process enhancements do not impact the data elements collected for SAVE. The same information will continue to be used to verify citizenship and immigration status; however, data will be accessed differently through the use of the Person Centric Entity Resolution microservice.

Sponsor Deeming and Agency Reimbursement Information Collection

The information collected from the benefit-granting agency about actions that an agency adjudicating federal means-tested public benefits takes to deem sponsor income as part of applicant income for purposes of federal means-tested benefits eligibility and to seek reimbursement from sponsors for the value of benefits provided to sponsored applicants may include:

- Whether the benefit-granting agency approved or denied the application for the means-tested public benefit;
- If the benefit-granting agency denied the application, whether the denial was based upon the information that SAVE 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 reimbursement obligation; and
- Whether the benefit-granting agency conducted a collection action or other proceeding 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).

Privacy Risk: There is a risk that USCIS collects sponsor deeming and agency reimbursement information for SAVE cases that do not involve a federal means-tested public benefit.

Mitigation: This risk is mitigated. SAVE does not provide sponsor information and will not offer the option to provide sponsor deeming and agency reimbursement information for cases that do not involve a federal means-tested public benefit.

Privacy Risk: There is a risk of an over collection of information.

Mitigation: This risk is mitigated. The process of collecting information related to deeming will start with a threshold question of how the agency adjudicated the application for the benefit. If the agency denied the application, the agency will have an opportunity to select a reason why (i.e., deeming made them ineligible, immigration status made them ineligible, or another reason) and the information collection will stop at that point. If the agency approved the application, then SAVE will proceed with the rest of the information collection process. All questions related to the new information collection are narrowly scoped to relate to actions that agencies adjudicating federal means-tested public benefits take to deem sponsor income as part of applicant income for purposes of federal means-tested benefits eligibility and to seek reimbursement from sponsors for the value of benefits provided to sponsored applicants.

Privacy Risk: There is a risk that the user agency provides inaccurate sponsor deeming and agency reimbursement information.

Mitigation: This risk is mitigated. USCIS collects sponsor deeming and agency reimbursement information directly from the user agency so that the most current and accurate information about these processes is provided to USCIS. However, if the user agency provides inaccurate information, it would not affect the applicant's immigration benefit requests that are approved or pending. In this regard, bonded aliens and benefit applicants are afforded opportunities for records correction with respect to the accuracy of application documents submitted to USCIS and benefit granting agency, respectively, to ensure the accuracy of information submitted in these processes. For sponsor deeming and agency reimbursement processes, sponsors are required by 8

CFR 213a.3 to update address information within 30 days of a change of address to ensure accurate information. The SAVE interface control agreement and user testing processes mitigate inaccurate data flows and other technical risks. Auditing and monitoring of reports and system use will ensure prompt identification and correction of inaccurate information.

Privacy Risk: There is a risk that, for SAVE cases in which a state health care agency receives sponsor information through the HHS-CMS VLP service, SAVE will expose unnecessary case information by placing derivative copies of these cases in the wrong agency account.

Mitigation: This risk is mitigated. SAVE will work with HHS-CMS and each agency participating in the information collection to mitigate this risk. Specifically, SAVE will ensure that each agency includes an identifier unique to itself as part of each SAVE case transmitted through the HHS-CMS VLP service, and that this identifier accurately maps to the separate account that the agency uses to connect directly with SAVE ("user agency account"). In addition, SAVE will use testing and other quality assurance measures to ensure the accuracy of this mapping and the consequent creation and placement of each derivative case in the correct user agency account.

Person Centric Entity Resolution Microservice

SAVE's use of the Person Centric Entity Resolution microservice does not impact the collection of information or the sources of information for SAVE. The Person Centric Entity Resolution microservice accesses the same data from the same systems as SAVE currently does in order to verify citizenship and immigration status, but through a live feed from eCISCOR; direct connections to CPMS, USCIS ELIS, CIS 2, CLAIMS 4, and Global; and, through ESB 2. The Person Centric Entity Resolution microservice retrieves data from various USCIS source systems and then associates the data from those systems. In addition, it queries the same external systems that VIS does. This data is then used by SAVE instead of SAVE relying on data in its nightly feeds or having to go out to different systems.

The Person Centric Entity Resolution microservice retrieves and caches information from the source systems in near real-time. The Person Centric Entity Resolution microservice correlates multiple records belonging to one individual by using a strong matching algorithm that includes matching, for example, A-Number along with other biographic identifiers to determine a match confidence score. A match confidence score is a measurement of the level of confidence in the match between the information submitted by the user agency and the information received from the data source. Submissions that do not meet the match confidence threshold are routed to the SAVE manual resolution process.

The USCIS Status Verification Operations Office identifies inconsistencies between databases as part of the SAVE manual resolution process. If a discrepancy is encountered or if no record is found pertaining to an individual, status verifiers conduct a manual search of DHS-accessed databases to determine citizenship and immigration status. If possible, status verifiers

will verify the applicant's citizenship and immigration status and request an update to the database. The applicant may be referred to a local USCIS office or to the appropriate record holding agency to resolve discrepancies that cannot be clarified through database or record searches.

Privacy Risk: There is a risk that information retrieved via eCISCOR and ESB 2, as opposed to a direct interface between PCS and the other source systems, may experience a delay in time that could affect the accuracy of the information.

Mitigation: This risk is mitigated. USCIS mitigates this risk by ensuring that retrieval of data through eCISCOR and ESB 2 happens in real time despite occurring through an intermediary system. In addition, SAVE requires user agencies to submit a case for SAVE personnel to review through the additional verification process if the user agency or the benefit applicant disagrees with an initial immigration status verification response provided by SAVE.

Uses of the Information

SAVE continues to check citizenship and immigration status for granting benefits, licenses, and other lawful purposes as described in the published SAVE PIA and subsequent updates.[27] The VIS migration and transition to paperless process enhancements do not add additional risks to uses of the information.

Sponsor Deeming and Agency Reimbursement Information Collection

SAVE will now receive the user agency's final determination of benefit eligibility for those agencies that adjudicate federal means-tested public benefits. SAVE will use the information collected to have greater visibility into whether and how benefit-granting agencies use the sponsor and household member information that SAVE provides for the deeming and reimbursement processes.

Privacy Risk: There is a risk that authorized user agencies could use the data for purposes inconsistent with the original collection.

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

[27] See DHS/USCIS/PIA-006, DHS/USCIS/PIA-006(a), and DHS/USCIS/PIA-006(b), available at https://www.dhs.gov/publication/systematic-alien-verification-entitlements-save-program.

USCIS requires all SAVE user agencies to abide by all security requirements as agreed to upon enrollment in SAVE through MOAs or CMAs and described in the published DHS/USCIS/PIA-006 and subsequent updates.[28] Attempts to evade the security controls can result in loss of access to SAVE.

Person Centric Entity Resolution Microservice

The Person Centric Entity Resolution microservice enhancement brings greater accuracy and efficiency to the citizenship and immigration status verification process by allowing USCIS to compare the information provided by a user agency against existing USCIS, DHS, and external systems to determine if the information supplied by the user agency matches an identity in existing source systems. This update creates no increased privacy impact to use of the information.

Administration of Bonds

USCIS will use SAVE information to administer bonds posted as security for performance and fulfillment of the financial obligations of a bonded alien (someone who is not a U.S. Citizen) to the U.S. Government. Specifically, USCIS will use information from SAVE as a way of learning whether a bonded alien may have applied for or received certain public benefits as defined in 8 CFR 212.21(b). An application for these public benefits is not an indication of a bond breach in and of itself, but acceptance of a public benefits for more than 12 months in the aggregate within any 36-month period (such that, for instance, receipt of two benefits in one month counts as two months), after the alien's adjustment of status until the bond is cancelled pursuant to 8 CFR 213.1(g), may constitute a breach.

If the bonded alien was the subject of a SAVE immigration status verification request for one or more public benefits as defined in 8 CFR 212.21(b) during the governing time frame, SAVE will supply certain data to the USCIS ELIS-based repository of bond information. The data from SAVE will include agency name, type of benefit (Medicaid, SSI, etc.), and the benefit requestor's full name, date of birth, and immigration identifier (i.e., A-number or other numeric identifier that the requestor supplied to the benefit-granting agency). The data from SAVE will also include any available sponsor deeming and reimbursement information. USCIS personnel will then consult the USCIS ELIS-based repository in the course of determining whether a bond breach has occurred. SAVE data will not be used for administrative (non-criminal) immigration enforcement purposes, such as certain bonds issued by DHS entities other than USCIS.

[28] See DHS/USCIS/PIA-006, DHS/USCIS/PIA-006(a), and DHS/USCIS/PIA-006(b), available at https://www.dhs.gov/publication/systematic-alien-verification-entitlements-save-program.

Privacy Risk: There is a risk that USCIS could use sponsor deeming and agency reimbursement data for purposes inconsistent with the original collection.

Mitigation: This risk is mitigated. USCIS will only use the information collected for the purposes detailed in the published SAVE PIAs and SORN, and only as approved by the Office of Management and Budget through the Information Collection Review process. All records will be protected from unauthorized access through appropriate administrative, physical, and technical safeguards that include restricting access to authorized personnel who have a need-to-know. USCIS will limit access to PII by employing role-based access (only allowing access to users who need particular PII to perform their duties). USCIS will also deploy user logs to ensure users are only accessing information related to their job functions.

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

Notice

This PIA update provides general notice to the public by describing the changes to SAVE and the information storage and maintenance practices by USCIS as data is migrated to the AWS public cloud platform. USCIS is also concurrently issuing a revised SAVE SORN[29] to cover the sponsor deeming and agency reimbursement information collection. USCIS continues to provide notice of these enhancements to SAVE user agencies through updated user manuals, SAVE newsletters, training, the SAVE log-in screen, and press releases on USCIS's website. Additionally, the MOAs between SAVE and user agencies require the user agencies to provide notice to the applicants, consistent with notice required by the Privacy Act, that informs applicants about how their information is used; that providing the information is voluntary; and the consequences of not providing the requested information. The USCIS Verification Division provides guidance to user agencies concerning notice to the applicants in the SAVE Program Guide and the agency SAVE Self-Assessment Guide.

Privacy Risk: There is a privacy risk that individuals providing information to USCIS will not be aware that their information is being stored on a server not owned or controlled by USCIS.

Mitigation: This risk is partially mitigated. This PIA update provides notice that information is stored in AWS, a commercial cloud-based system, and USCIS provides general notice to individuals about the collection and use of their information. USCIS, however, does not

[29] See DHS/USCIS-004 Systematic Alien Verification for Entitlements Program System of Records, 85 FR 31798 (May 27, 2020).

provide explicit notice at the time of collection that the information may be stored in a cloud-based system. Regardless of storage location of records, VIS records are governed by USCIS' collection, use, and dissemination of personally identifiable information and are required to meet all applicable federal security guidelines.

Data Retention by the Project

This update does not change the length of time that SAVE-related data is retained in VIS. USCIS continues to adhere to the NARA-approved retention schedule, N1-566-08-07, for VIS. The SAVE-related records in VIS are retained for 10 years from the date of completion of the verification, unless the records are part of an ongoing law enforcement investigation, in which case records may be retained until completion of the investigation. This period is based on the statute of limitations for most types of misuse or fraud possible using SAVE (under 18 U.S.C. § 3291, the statute of limitations for false statements or misuse regarding passports, citizenship, or naturalization documents). There are no additional risks to data retention.

Information Sharing

USCIS will continue to share and disclose SAVE information as outlined in the published DHS/USCIS/PIA-006 and subsequent updates.[30] USCIS will continue to share and disclose SAVE information with DHS components for law enforcement purposes when SAVE detects possible fraud and/or misuse, on a case-by-case basis. USCIS will also continue to share and disclose SAVE information externally for law enforcement purposes and to respond to federal, state, local, and tribal government agencies citizenship and immigration status queries.

Sponsor Deeming and Agency Reimbursement Information Collection

For federal means-tested public benefits, there is a change in the workflow as the SAVE case is not closed out when USCIS returns the citizenship and immigration status response. Once the benefit-granting agency makes a determination about the applicant's eligibility, the benefit-granting agency will go back into SAVE.

The process of collecting information related to deeming will start with a threshold question of how the agency adjudicated the application for the benefit. If the agency denied the application, the agency will have an opportunity to select a reason why (e.g., deeming made the individual ineligible, immigration status made the individual ineligible, or another reason) and the information collection will stop at that point. If the agency approved the application, then SAVE will proceed with the rest of the information collection process.

SAVE will create and share reports that include sponsor deeming and agency reimbursement information to both federal means-tested public benefit agencies as well as

[30] See DHS/USCIS/PIA-006, DHS/USCIS/PIA-006(a), and DHS/USCIS/PIA-006(b), available at https://www.dhs.gov/publication/systematic-alien-verification-entitlements-save-program.

oversight entities for monitoring and compliance activities. The reports shared with the federal means-tested public benefit agencies will include both PII and general statistics. The federal agencies will use case specific information (e.g., verification case number, name, date of birth, immigration status, benefit type) and statistical information (e.g., total of means-tested public benefits granted, how often the agency deemed the sponsor's income, if a deeming exception applied and a breakdown of which exceptions applied most often) to monitor agencies that administer the federal benefits to ensure they are following federal deeming and reimbursement rules and if adjustments need to be made. For example, HHS/CMS administers the nation's major healthcare programs like Medicaid and CHIP. However, state healthcare agencies are the entities that adjudicate healthcare benefit requests. HHS/CMS needs access to both PII and statistical information in order to properly monitor state agencies that use federal funds to grant benefits.

DHS/USCIS will further provide access to relevant reports to approved adjudicating SAVE user agencies to assist them in managing their SAVE cases and monitoring their own compliance with SAVE program rules and the federal deeming and reimbursement rules. User agencies will be able to 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, passport number, I-94 Arrival/Departure Record), immigration status, if the benefit was administered, if the sponsor's income was deemed, etc. Users will also be able to run high-level reports to pull statistics indicating how many times the benefit-granting agency deemed the sponsor's income, how many cases did an exception apply, how many cases the sponsor repaid the government agency, etc. The reports will also be used to look for anomalies/patterns that could indicate the federal deeming/reimbursement rules are not being followed. USCIS may also indicate to agencies whether the sponsor may be fraudulent or otherwise ineligible to serve as a sponsor.

In addition, SAVE shares and will continue to share general information with oversight entities, such as the U.S. Government Accountability Office (GAO), Congress, DHS, and USCIS Headquarters, as needed and requested. The information shared will now include sponsor deeming and agency reimbursement information in order to verify that federal means-tested public benefit agencies are complying with federal deeming and reimbursement laws, rules and regulations. These reports may include information, such as how many means-tested benefits an agency granted, how many times the agency deemed the sponsor's income before granting the benefit, if a deeming exception applied and the specific exceptions applied most often, or how many cases the agency sent the sponsor a reimbursement request letter. Oversight entities may use this information to monitor if agencies are increasing their compliance with deeming and reimbursement requirements or if modifications need to be made.

Privacy Risk: There is a risk that data shared by USCIS with external partners will be used beyond the original purpose of collection (i.e., to assist user agencies in adjudicating benefits).

Mitigation: This risk is mitigated. All SAVE user agencies must adhere to a MOA or a CMA, which include binding responsibilities regarding proper information usage and handling of SAVE information. The MOAs and CMAs also contain specific requirements limiting use of SAVE-related information to those purposes set forth in the agreements. The agreements between USCIS and external entities fully outline responsibilities of the parties, security standards, and limits of use of the information. Use of SAVE is governed by need-to-know criteria that require the user agency demonstrate the need for the data before verification of citizenship and immigration status is provided.

Privacy Risk: There is a risk that the reports regarding federal deeming and reimbursement rules made available to the federal means-tested public benefit agencies for oversight purposes may result in unauthorized onward sharing.

Mitigation: This risk is mitigated. All user agencies who sign an MOA or CMA with USCIS to use SAVE agree to safeguard information provided by SAVE to ensure that the information is not used for any other purpose than described in the MOA or CMA and protect its confidentiality, which includes ensuring that the information is not disclosed to any unauthorized person(s) without the prior written consent of USCIS.

Person Centric Entity Resolution Microservice

SAVE's use of the Person Centric Entity Resolution microservice does not impact existing external sharing arrangements as described in the published DHS/USCIS/PIA-006 and subsequent updates.[31] The Person Centric Entity Resolution microservice retrieves, consolidates, and caches data from most of the external source systems through the ESB 2 in support of the automated verification process. The previous process required VIS, through the ESB 2, to send and retrieve the individual's biographic information from external source systems with each citizenship and immigration status verification request. This enhanced process no longer requires VIS to send individual requests to external source systems. The Person Centric Entity Resolution microservice retrieves and stores batched data from USCIS systems (via the ESB 2) on a daily basis to serve as the single, back-end repository. In addition, the Person Centric Entity Resolution microservice queries the same external systems that VIS directly queried.

[31] See DHS/USCIS/PIA-006, DHS/USCIS/PIA-006(a) and DHS/USCIS/PIA-006(b), available at https://www.dhs.gov/publication/systematic-alien-verification-entitlements-save-program.

Migration to Cloud-based Platform

USCIS migrated VIS to the AWS cloud platform. This migration does not impact information sharing practices in VIS from the previous legacy system. USCIS requires AWS to segregate VIS data from all other third-party data. The cloud-hosted VIS system absorbed legacy VIS functionality and system interconnections.

SAVE Paperless Processing

The paperless process that SAVE implemented does not impact information sharing practices as described in the SAVE Program PIAs. SAVE is not sharing data with any new user agency or entity as a result of the paperless rollout. User agencies can request additional information and securely scan and upload copies of immigration documents to SAVE, rather than through the mail.

Administration of Bonds

The use of information from SAVE as part of administering bonds does not impact information sharing practices as described in the SAVE Program PIAs and SORN. USCIS will use information from SAVE to administer bonds posted as security for performance and fulfillment of the financial obligations of a bonded alien (someone who is not a U.S. Citizen) to the U.S. Government. Specifically, USCIS will use information from SAVE as an input for the process for determining whether the alien has violated the condition of the bond under which, if the alien receives any public benefits, as defined in 8 CFR 212.21(b), for more than 12 months in the aggregate within any 36 month period (such that, for instance, receipt of two benefits in one month counts as two months), after the alien's adjustment of status until the bond is cancelled pursuant to 8 CFR 213.1(g), the obligor or agent/co-obligor shall pay the entire amount of the bond as directed by DHS.

USCIS will use SAVE data elements such as name, date of birth, one or more immigration identifiers, and type of benefit to determine whether SAVE received an immigration status verification request about the bonded alien for a public benefit, as defined in 8 CFR 212.21(b), within the governing time period. In addition, SAVE will supply available information about receipt of benefits supplied by the user agencies. This information from SAVE may indicate that the bonded alien may have received such benefit and thus breached this condition of the bond. In this situation, USCIS will obtain additional evidence from the bonded alien and/or other entities to determine whether the bonded alien received the public benefit.

Privacy Risk: There is a risk that benefit applicants whose information is verified through SAVE may not be aware that USCIS will use SAVE information to administer bonds.

Mitigation: USCIS has mitigated this risk through the publication of the PIA, SORN, and any additional notices published on the USCIS website and/or by the benefit granting agency.

Redress

This update does not impact how access, redress, and correction may be sought through USCIS. There are no changes to the access, redress, and corrections procedures identified in the published DHS/USCIS/PIA-006 and subsequent updates.[32] This update creates no increased privacy impact.

The user agency is able to correct information within SAVE. The user agency submits an initial request based on the document or information provided by the applicant. Within seconds, SAVE returns the applicant's status or prompts the user agency to "Institute Additional Verification." Additional verification procedures provide an opportunity for a thorough check of the applicant's records.

USCIS also continues to provide individuals with access to their information through a Privacy Act or Freedom of Information Act (FOIA) request. Individuals not covered by the Privacy Act or Judicial Redress Act (JRA) still may obtain access to records consistent with FOIA unless disclosure is prohibited by law or if the agency reasonably foresees that disclosure would harm an interest protected by an exemption. U.S. citizens and Lawful Permanent Residents may also file a Privacy Act request to access their information. If an individual would like to file a Privacy Act or FOIA request to view his or her USCIS records, the request can be mailed to the following address:

National Records Center
Freedom of Information Act/Privacy Act Program
P. O. Box 648010
Lee's Summit, MO 64064-8010

Persons not covered by the Privacy Act or JRA are not able to amend their records through FOIA. Should a non-U.S. person find inaccurate information in his or her records received through FOIA, he or she may visit a local USCIS Field Office to identify and amend inaccurate records with evidence.

Auditing and Accountability

USCIS ensures that practices stated in this PIA comply with federal, DHS, and USCIS standards, policies, and procedures, including standard operating procedures, rules of behavior, and auditing and accountability procedures. VIS is maintained in the AWS, which is a public cloud designed to meet a wide range of security and privacy requirements (e.g., administrative, operational, and technical controls) that are used by USCIS to protect data in accordance with

[32] Id.

federal security guidelines.[33] AWS is Federal Risk and Authorization Management Program (FedRAMP)-approved and authorized to host PII.[34] FedRAMP is a U.S. Government-wide program that delivers a standard approach to the security assessment, authorization, and continuous monitoring for cloud services.

USCIS requires VIS to undergo the security assessment process to verify adherence to DHS privacy and security requirements. USCIS validates technical and security controls to preserve the confidentiality, integrity, and availability of the data during the security authorization process. These technical and security controls limit access to USCIS users and mitigates privacy risks associated with unauthorized access and disclosure to non-USCIS users. Further, DHS security specifications require auditing capabilities that log the activity of each user in order to reduce the possibility of misuse and inappropriate dissemination of information. All user actions are tracked via audit logs to identify information by user identification, network terminal identification, date, time, and data accessed. All USCIS systems employ auditing measures and technical safeguards to prevent the misuse of data.

All USCIS employees with access to VIS complete annual mandatory privacy awareness and Information Security training. These trainings present Privacy Act responsibilities and policies regarding security, sharing, and safeguarding of official information and PII on USCIS systems. The trainings are updated as appropriate, and all USCIS employees are required to take these trainings annually.

Privacy Risk: The data maintained by AWS for the purposes of cloud hosting may be vulnerable to breach because security controls may not meet system security levels required by DHS.

Mitigation: This risk is mitigated. USCIS is responsible for all PII associated with the VIS system, whether on a USCIS infrastructure or on a vendor's infrastructure, and it therefore imposes strict requirements on vendors for safeguarding PII data. This includes adherence to the DHS 4300A Sensitive Systems Handbook, which provides implementation criteria for the rigorous requirements mandated by DHS's Information Security Program.[35]

Privacy Risk: There is a risk that SAVE records can be accessed by unauthorized personnel since VIS resides in AWS, a public cloud.

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[33] Public clouds are owned and operated by third-party service providers whereas private clouds are those that are built exclusively for an individual enterprise.
[34] See https://marketplace.fedramp.gov/#/product/aws-us-eastwest?status=Compliant&sort=productName.
[35] See https://www.dhs.gov/publication/dhs-4300a-sensitive-systems-handbook.

Mitigation: This risk is mitigated. Although VIS operates in a public cloud, VIS is separated from other public cloud customers. VIS operates in a Virtual Private Cloud, which is a private component to the public cloud. USCIS controls access to the systems within the cloud, not AWS.

Responsible Official

Donald K. Hawkins
Privacy Officer
U.S. Citizenship and Immigration Services
U.S. Department of Homeland Security
(b)(6)

Approval Signature

Original, signed copy on file at the DHS Privacy Office.

Dena Kozanas
Chief Privacy Officer
U.S. Department of Homeland Security
(b)(6)

Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
pia@hq.dhs.gov
www.dhs.gov/privacy

PRIVACY THRESHOLD ANALYSIS (PTA)

This form serves as the official determination to identify the privacy compliance requirements for all Departmental uses of personally identifiable information (PII).

A Privacy Threshold Analysis (PTA) serves as the document used to identify information technology (IT) systems, information collections/forms, technologies, rulemakings, programs, information sharing arrangements, or pilot projects that involve PII and other activities that otherwise impact the privacy of individuals, and to assess whether there is a need for additional privacy compliance documentation or requirements. A PTA includes a general description of the IT system, information collection, form, technology, rulemaking, program, pilot project, information sharing arrangement, or other Department activity and describes what PII is collected (and from whom) and how that information is used. In accordance with the Fair Information Practice Principles (FIPPs),[1] Component Privacy Officers should consider best practices for privacy safeguards and principles when reviewing and adjudicating PTAs.

Please complete the attached PTA and submit it to your Component Privacy Office. If you do not have a Component Privacy Office, please send the PTA to the DHS Privacy Office:

Senior Director, Privacy Compliance
The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
[redacted]@hq.dhs.gov (b)(6)

The Component or DHS Privacy Office will review this form and assess whether any privacy compliance documentation is required. If privacy compliance documentation is required – such as Privacy Impact Assessment (PIA), System of Records Notice (SORN), Privacy Act Statement/Privacy Notice, or Computer Matching Agreement (CMA) – the Component Privacy Office will send you a copy of the relevant compliance template to complete and return.

[1] *See* The Fair Information Practice Principles | Homeland Security.

PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

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

PROJECT, PROGRAM, OR SYSTEM MANAGER

Name:	Irina Sidelnikov		
Office:	Office of Information Technology	**Title:**	OIT Project Manager
Phone:	[redacted]	**Email:**	[redacted]@uscis.dhs.gov

(b)(6)

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name:	Minh Vo		
Phone:	N/A	**Email:**	[redacted]@uscis.dhs.gov

[2] 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[3]. 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:

[3] 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 Agreement 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[4]; the Personal Responsibility and Work Opportunity Reconciliation Act[5] Title IV, Subtitle A, of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996[6], and the REAL ID Act of 2005[7], the Patient Protection and Affordable Care Act of 2010,[8] and the Federal Aviation Administration Extension, Safety and Security Act of 2016.[9] 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."

[4] Immigration Reform and Control Act of 1986, Public. Law. No. 99-603

[5] Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Public Law No. 104-193, 110 Statute 2168

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

[7] REAL ID Act of 2005, Public. Law No.109-13, 119 Statute 231

[8] Patient Protection and Affordable Care Act of 2010, Public Law No. 111-148

[9] 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[10] 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.

[10] 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[11] to benefit applicants that may require records correction.

[11] 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*[12] and 14248, *Preserving and Protecting the Integrity of American Elections*[13] 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[14] and 8 U.S.C. 1644[15] 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[16] 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)[17]." Executive Order 14159[18] directs the Secretary to "ensure that State and local officials have, without the requirement of the payment

[12] https://www.federalregister.gov/documents/2025/01/29/2025-02006/protecting-the-american-people-against-invasion
[13] https://www.federalregister.gov/documents/2025/03/28/2025-05523/preserving-and-protecting-the-integrity-of-american-elections
[14] 8 USC 1373 Communication between government agencies and the Immigration and Naturalization Service
[15] 8 USC 1644 Communication between State and local government agencies and Immigration and Naturalization Service
[16] Executive Order 14248 Preserving and Protecting the Integrity of American Elections
[17] 8 USC. 1373(c) Obligation to respond to inquiries
[18] 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[19], 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[20] and 1015(f)[21] 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[22], and 8 U.S.C. 1367[23] (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.[24]

Current Process - Voter Registration and Voter List Maintenance Verification

[19] 52 USC 20507 Requirements with respect to administration of voter registration

[20] 18 USC 611 Voting by aliens

[21] 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

[22] 5 USC 552a Records maintained on individuals

[23] 8 USC 1367 Penalties for disclosure of information

[24] 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 verify United States citizenship for naturalized and certain acquired citizens[25] 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.[26]
- 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

[25] "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.

[26] 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),[27] 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

[27] 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[28]. 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.[29]

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[30] ☒ Members of the public

[28] 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.

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

[30] 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.

	☒ U.S. Persons (U.S citizens or lawful permanent residents) ☒ non-U.S. Persons ☒ DHS Employees/Contractors (list Components): United States Citizenship and Immigration Services ☐ Other federal employees or contractors (list agencies): *Click here to enter text.*
2(a) Is information meant to be collected from or about sensitive/protected populations?	☐ No ☒ 8 USC § 1367 protected individuals (e.g., T, U, VAWA)[31] ☒ Refugees/Asylees ☐ Other. Please list:

3. What specific information about individuals is collected, maintained, used, or disseminated?

Information Collected from Requesting Agencies about applicants for benefits, licenses, or other authorized purposes:

- Full Name
- Date of birth
- Benefit sought
- Driver license
- State Identification
- Citizenship or nationality
- Country of birth
- A-Number
- Social Security Number
- Alias
- Customer Agency-issued Case Number

Unique Immigration Identifiers Used:

[31] 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[32]
  - 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

[32] 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?[33] If applicable, check all that apply.

[33] 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.

☒ Social Security number ☒ Alien Number (A-Number) ☐ Tax Identification Number ☒ Visa Number ☒ Passport Number ☐ Bank Account, Credit Card, or other financial account numbers	☐ Social Media Handle/ID ☒ Driver's License/State ID Number ☐ Biometric identifiers *(e.g., FIN, EID)* ☒ Biometrics.[34] *Please list modalities (e.g., fingerprints, DNA, iris scans): Click here to enter text.* ☒ Other. *Please list:* 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.
3(b) Please provide the specific legal basis for the collection of SSN:	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. 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.
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.	
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.	

[34] 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.

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, *SSN Collection and Use Reduction*,[35] 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.*
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[36] and Amazon Relational Database Services[37] 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.

4. How does the Project, Program, or System retrieve information?	☒ By a unique identifier.[38] Please list all unique identifiers used: • Full name • Alias

[35] *See* https://www.dhs.gov/publication/privacy-policy-instruction-047-01-010-ssn-collection-and-use-reduction.

[36] 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.

[37] 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.

[38] 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.

	• Date of birth
	• Immigration enumerator:
	  ○ Alien number/United States Citizenship and Immigration Services Number,
	  ○ Form I-94, Arrival/Departure Record number,
	  ○ Student and Exchange Visitor Information System Identification number,
	  ○ Citizenship or Naturalization Certificate number
	  ○ Card Number / I-797 Receipt Number,
	  ○ Visa Number, or
	  ○ Foreign passport number (if submitted with another immigration enumerator) and issuing country
	• Social Security Number
	• United States passport number
	• Customer Agency-issued Case Number
	• Case Verification Number
	
	☐ By a non-unique identifier or other means. Please describe:
	Click here to enter text.

5. What is the records retention schedule(s) for the information collected for each category type (include the records schedule number)**?** *If no schedule has been approved, please provide proposed schedule or plans to determine it.* *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.*[39]	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. 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.

[39] *See* https://dhsconnect.dhs.gov/org/comp/mgmt/ocio/cdod/rm/Pages/DHS-Records-Officers.aspx

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)**?**	Data is automatically purged annually based on NARA disposal schedule N1-566-08-07.
6. Does this Project, Program, or System connect, receive, or share PII with any other DHS/Component projects, programs, or systems?[40]	☐ No. ☒ Yes. If yes, please list: **United States Citizenship and Immigration Services Systems:** • Central Index System • Electronic Immigration System • Computer Linked Application Information Management System 3 • Enterprise Citizenship and Immigration Services Centralized Operational Repository • GLOBAL (not an acronym) • RAILS (not an acronym) • Customer Profile Management System • Reengineered Naturalization Application Casework System • Marriage Fraud Amendment System • Salesforce Customer Relationship Management Customer Relationship Management[41] **Department of Homeland Security Systems:** • Department of Homeland Security OneNet • Immigration and Custom Enforcement Student and Exchange Visitor Information System • Immigration and Custom ENFORCE Integrated Database

[40] PII may be shared, received, or connected to other DHS systems directly, automatically, or by manual processes.
[41] Provides a unified platform where data from different departments can be accessed and used to improve customer interactions.