



## PRIVACY THRESHOLD ANALYSIS (PTA)

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**Please complete this form and send it to your Component Privacy Office.** If you are unsure of your Component Privacy Office contact information, please visit <https://www.dhs.gov/privacy-office-contacts>. If you do not have a Component Privacy Office, please send the PTA to the DHS Privacy Office:

Senior Director, Privacy Compliance  
DHS Privacy Office  
U.S. Department of Homeland Security  
Washington, DC 20528

[redacted] (b)(6)

[redacted]@hq.dhs.gov

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## PRIVACY THRESHOLD ANALYSIS (PTA)

### SUMMARY INFORMATION

|                                                |                                                        |                                                  |                       |
|------------------------------------------------|--------------------------------------------------------|--------------------------------------------------|-----------------------|
| <b>Project, Program, or System Name:</b>       | Systematic Alien Verification for Entitlements Program |                                                  |                       |
| <b>Component or Office:</b>                    | U.S. Citizenship and Immigration Services (USCIS)      | <b>Office or Program:</b>                        | Verification Division |
| <b>FISMA Name (if applicable):</b>             | Verification Information System                        | <b>FISMA Number (if applicable):</b>             | CIS-06285-MAJ-06285   |
| <b>Type of Project or Program:</b>             | System                                                 | <b>Project or program status:</b>                | Operational           |
| <b>Date first developed:</b>                   | July 7, 2007                                           | <b>Pilot launch date:</b>                        | N/A                   |
| <b>Date of last PTA update</b>                 | September 11, 2025                                     | <b>Pilot end date:</b>                           | N/A                   |
| <b>ATO Status (if applicable):<sup>1</sup></b> | Complete                                               | <b>Expected ATO/ATP/OA date (if applicable):</b> | Ongoing Authorization |

### PROJECT, PROGRAM, OR SYSTEM MANAGER

|                |                                       |               |                          |
|----------------|---------------------------------------|---------------|--------------------------|
| <b>Name:</b>   | [redacted] (b)(6) (b)(7)(C) (b)(7)(F) |               |                          |
| <b>Office:</b> | Office of Information Technology      | <b>Title:</b> | OIT Project Manager      |
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### INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

|               |                                       |               |                          |
|---------------|---------------------------------------|---------------|--------------------------|
| <b>Name:</b>  | [redacted] (b)(6) (b)(7)(C) (b)(7)(F) |               |                          |
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<sup>1</sup> The DHS OCIO has implemented a streamlined approach to authorizing an Authority to Operate (ATO), allowing for rapid deployment of new IT systems and initiate using the latest technologies as quickly as possible. This approach is used for selected information systems that meet the required eligibility criteria in order to be operational and connect to the network. For more information, see <https://dhsconnect.dhs.gov/org/comp/mgmt/ocio/ciso/Documents/DHS%20ATP%20Guide%20v2.0.pdf#search=atp>.



## SPECIFIC PTA QUESTIONS

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

The U.S. Citizenship and Immigration Services submits this updated Privacy Threshold Analysis to document the U.S. Citizenship and Immigration Services Verification Division and Office of Technology changes to the Systematic Alien Verification for Entitlements Program. The U.S. 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 and enables the continuous monitoring of United States citizens for both changes in citizenship status and indicator of death. The U.S. Citizenship and Immigration Services previously expanded the use of the Systematic Alien Verification for Entitlements to include verification of citizenship for natural born United States citizens.

#### March 2026 Updates

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

1. **Updated Phase Four (4) to replace a proposed connection with Customs and Border Protection with a new direct connection to the Department of State's Consular Consolidated Database / American Citizen Record Query system, to search passport and U.S. citizenship information.** (Implemented – December 2025) Prior to implementation of the automated process, the Systematic Alien Verification for Entitlements Program used a manual information sharing process. This manual information sharing with the Department of State (using spreadsheets via email or other medium) occurred between October 2025 and December 2025. Information provided to the Department of State within the spreadsheets included the following biographic data: First Name, Last Name, Date of Birth, and Social Security number. In return the Department of State, provided the same returning biographic data elements and the U.S. Passport Number, Issuance Date, and related endorsement code where applicable. Once information was received from the Department of State, Systematic Alien Verification for Entitlements Program cases were manually updated when the information returned confirmed the individual to be a United States Citizen per the Department of State. The query of the Department of State /American Citizen Record Query through the Verification Data Integration Services data was included as part of the automated Systematic Alien Verification for Entitlements Program process using a direct connection via Application Programming Interface in December 2025.
2. **Added the Monitoring Agency – Reporting Only Account.** Using the new Monitoring Agency – Reporting Only Account, user agencies with the legal authority to monitor and audit benefits granted may view case data such as biographic data, enumerators, case submission date/time, and the System Alien Verification for Entitlements Program response information from cases



previously created by the overseen or associated user agency. Reporting options exist for individual agencies and their case data.

3. **Added the Individual Taxpayer Identification Number as an alternative identifier.** The Individual Taxpayer Identification Number was added to the now published Systematic Alien Verification for Entitlements Privacy Impact Assessment and System of Records Notice published on October 30, 2025. This Privacy Threshold Analysis documents the potential to collect the Individual Taxpayer Identification Number as an alternate identifier from user agencies. However, the Individual Taxpayer Identification Number is not issued by the Social Security Administration, it is issued by the U.S. Department of the Treasury.
4. **Removed Nlets as the preferred data provider for Driver's License information.** Use of Nlets was added to the now published Systematic Alien Verification for Entitlements Program Privacy Impact Assessment and System of Records Notice published on October 30, 2025. Research and discovery of possible connections to new data partners enabling access to Driver's License information is being conducted to enable Systematic Alien Verification for Entitlements Program users to create cases using name, date of birth, and a Driver's License number. The Systematic Alien Verification for Entitlements Program would potentially use Driver License numbers to query the issuing authority (i.e. state or territory) to acquire the subject's federal enumerator, such as the Social Security number or Alien Number, and then combine that information with other Systematic Alien Verification for Entitlements Program data to continue the process to verify citizenship or immigration status. The previous Privacy Threshold Analysis included reference to the National Law Enforcement and Telecommunication System (NLETS) which is now referred to as Nlets (not an acronym). While the U.S. Citizenship and Immigration Services continues to explore the future potential for leveraging a state issued identifier such as a Driver License number for accessing records to determine citizenship and immigration status, there are a variety of options for sourcing this information. This Privacy Threshold Analysis amends the previous proposal that describes Nlets as a data source. Nlets is an information broker service and does not store driver's license data. This work is exploratory at this time whereby any development or implementation will be included in a future Privacy Threshold Analysis. (Estimated Completion Date: To be determined)
5. **Added a new Social Security Number search capability within the Enterprise Citizenship and Immigration Services Centralized Operational Repository to Identify Alien Number for certain cases submitted without a provided Alien Number.** In scenarios where an Alien Number is not provided by the user agency or when the Alien Number is not provided by the Social Security Administration when records match and indicate the individual is foreign born, the Systematic Alien Verification for Entitlements Program will search U.S. Citizenship and Immigration Services records within the Enterprise Citizenship and Immigration Services Centralized Operational Repository to locate an Alien Number match using the verified Social



Security number. When an Alien Number is found, the Systematic Alien Verification for Entitlements Program will leverage that additional information to resolve the case and verify the citizenship or immigration status for the individual. When the Name, Date of Birth, and Alien Number returned match a record indicating the person is a naturalized United States Citizen, the appropriate Systematic Alien Verification for Entitlements Program response is provided to the end user as 'United States Citizen' for the individual. When the Alien Number returned does not indicate a United States Citizen, the case is routed to manual review for determining the specific immigration status. For cases where no Alien Number is found through this process, the case is resolved as Immigration Enumerator Required.

6. **Enhanced the Voter List Maintenance benefit category to enable User Agencies to Submit Recurring Voter Verification Cases to Receive Updated Information.** The Systematic Alien Verification for Entitlements Program provides multiple capabilities for applicable agencies to leverage the Systematic Alien Verification for Entitlements Program benefit categories that align with their use cases for verifying citizenship and immigration status for voter verification. The Voter Registration benefit category will be used for verifying initial citizenship and immigration status for purposes of being on the voter registration roll, while the Voter List Maintenance benefit category will be used for re-checking previously resolved voter verification cases to receive updated information such as a match to the death master file. The primary change is to the Voter List Maintenance benefit category which will provide a systematic response only and prevent cases from being auto escalated to manual review.
7. **Updates to the Web Services Interface Control Agreement - Development of Version 38.** The Systematic Alien Verification for Entitlements Program is planning to update its Web services interface control agreement for its user agencies. The new web services version, 38, will update the responses provided to users which enhances the Systematic Alien Verification for Entitlements Program query logic to provide more accurate information based on the need to know. Updates in web services version 38 will include: transfer from legacy Simple Object Access Protocol (SOAP) Application Programming Interface to modern Representational State Transfer (REST) architecture; ability to create cases with additional enumerators; new initial response structure for immigration status and employment authorization that aligns with manual verification responses, improved accuracy, and additional case processing information; and automated escalations to additional verification when applicable. (Projected deployment of Web services version 38 is by April 2026)
8. **Use of Manual Reports from Systematic Alien Verification for Entitlements Program records to support Public Charge.** The Systematic Alien Verification for Entitlements Program records will be used to produce manual reports identifying pending Forms I-485 and associated Form I-864s with corresponding Systematic Alien Verification for Entitlements Program queries



for federal means-tested benefits.<sup>2</sup> This information will inform appropriate bases of further inquiry during adjudication and be used as a prompt to seek additional information, including reaffirmation by the applicant that information provided on the application is accurate<sup>3</sup> and independent confirmation of applicant responses from benefit granting agencies or other sources. The Systematic Alien Verification for Entitlements Program information will not be used directly in adjudicative processes or as evidence supporting adjudicative determination. This effort supports Policy Memorandum PM-602-0190 from U.S. Citizenship and Immigration Services reaffirming for officers and the public Agency commitment to the faithful implementation of the public charge ground of inadmissibility within the current framework and in conjunction with ongoing rulemaking efforts.<sup>4</sup> In January 2026 U.S. Citizenship and Immigration Services began a pilot of this process beginning with two states.

**9. Removed inaccurate Systematic Alien Verification for Entitlements system connections.**

Previous versions of the Systematic Alien Verification for Entitlements Program Privacy Threshold Analysis documented connections to the Reengineered Naturalization Application Casework System (RNACS) and Marriage Fraud Amendment (MFA) System. The Verification Information System's Information System Security Officer has indicated that the Systematic Alien Verification for Entitlements Program does not connect to or receive information from these two systems, thus they are being removed from this document.

**September 2025 Updates**

The previously approved Privacy Threshold Analysis documented Secretary Noem's announcement of the Systematic Alien Verification for Entitlements Optimization Initiative. The following is a high-level summary of the phases identified. Of note future updates will remove references to "Phase" and just discuss updates to the Systematic Alien Verification for Entitlements Program.

- Phase 1: Free Service for State, Local, Tribal, Territory agencies and the Bulk Uploader. (Implemented)
- Phase 2: Integration with the Social Security Administration to allow for the full Social Security Number to be used as a non-Department of Homeland Security enumerator. (Implemented)
- Phase 3: Modification of the Security Administration integration to allow for the truncated Social Security Numbers (last 4-digits) to be used as a non-Department of Homeland Security enumerator. (Implemented)

<sup>2</sup> Applicants exempt from public charge requirements were not included.

<sup>3</sup> Form I-485, Page 19, Question 63 asks about Supplemental Security Income (SSI), Temporary Assistance for Needy Families (TANF), and other cash assistance. Form I-485, Page 19, Question 64 asks about long-term institutionalization at government expense.

<sup>4</sup> See *Public Charge Ground of Inadmissibility*, 90 FR 52168 (Nov. 19, 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)

## **2024 Update**

As part of the Systematic Alien Verification for Entitlements Program's normal review process, the U.S. Citizenship and Immigration Services intended 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.

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## **Program Overview**

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, including verification of citizenship for natural born United States citizens, and to enable the continuous monitoring of United States citizens for both changes in citizenship status and indicator of death.

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

The U.S. 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. The Systematic Alien Verification for Entitlements Program verifies immigration status/category and United States citizenship against Department of Homeland Security-accessed records. Historically, the Systematic Alien Verification for Entitlements Program has



not verified information for United States born citizens as a Department of Homeland Security immigration enumerator was previously required, but now the Systematic Alien Verification for Entitlements Program can verify United States-born United States citizens against Social Security Administration data. The Systematic Alien Verification for Entitlements Program does not determine an applicant's eligibility for a specific benefit or license, as this is the responsibility of the benefit/license granting agency.

As of April 1, 2025, the Systematic Alien Verification for Entitlements Program has revised its transaction charges for all state, local, tribal, and territorial government agencies using the Systematic Alien Verification for Entitlements Program to eliminate those charges. Federal agencies are still charged a fee to use the Systematic Alien Verification for Entitlements Program. The authority for the Systematic Alien Verification for Entitlements Program, and for particular Systematic Alien Verification for Entitlements Program authorized uses can be found in the Immigration Reform and Control Act<sup>5</sup>, the Personal Responsibility and Work Opportunity Reconciliation Act<sup>6</sup> Title IV, Subtitle A, of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996<sup>7</sup>, the REAL ID Act of 2005<sup>8</sup>, the Patient Protection and Affordable Care Act of 2010,<sup>9</sup> and the Federal Aviation Administration Extension, Safety and Security Act of 2016.<sup>10</sup> In addition, the Systematic Alien Verification for Entitlements Program has an obligation under 8 U.S.C. 1373(c) to "respond to an inquiry by a Federal, State or local government agency, seeking to verify or ascertain the citizenship or immigration status of any individual within the jurisdiction of the agency for any purpose authorized by law, by providing the requested verification or status information."

The U.S. 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 U.S. 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

<sup>5</sup> Immigration Reform and Control Act of 1986, Public Law No. 99-603

<sup>6</sup> Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Public Law No. 104-193, 110 Statute 2168

<sup>7</sup> Title IV, Subtitle A, of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 Public Law 104-208, 110 Statute 3009

<sup>8</sup> REAL ID Act of 2005, Public Law No. 109-13, 119 Statute 231

<sup>9</sup> Patient Protection and Affordable Care Act of 2010, Public Law No. 111-148

<sup>10</sup> Federal Aviation Administration Extension, Safety and Security Act of 2016 (Federal Aviation Administration Act), Public Law No. 114-190 § 3405(d) (July 15, 2016).



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 U.S. 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 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, including the Social Security Administration’s Numident<sup>11</sup> system, to access applicable information. The Systematic Alien Verification for Entitlements Program also has a Case Status Check capability that allows benefit applicants to view the status of their Systematic Alien Verification for Entitlements Program case. The system can also provide grant dates to user agencies which may assist those agencies with determining benefit eligibility. The Verification Division has a three (3) tier process when verifying an individual’s immigration status or United States citizenship.

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

<sup>11</sup> NUMIDENT or "Numerical Identification" refers to the master file of Social Security Administration records containing information about individuals who have applied for or been assigned a Social Security Number. This file includes records for applications, claims, and death records related to individuals with a Social Security Number.



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/U.S. Citizenship and Immigration Services number, Form I-94 Number, Card Number/I-797 Receipt number, or 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 since 2025. 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 Alien 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 Department of State's American Citizen Record Query. 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.

The program also added a new Social Security number search within the Enterprise Citizenship and Immigration Services Centralized Operational Repository to identify Alien Numbers for certain cases submitted without a provided Alien Number. In scenarios where an Alien Number is not provided by the agency or when the Alien Number is not provided by Social Security Administration when records match



and indicate the individual is foreign born, the Systematic Alien Verification for Entitlements Program will search the U.S. Citizenship and Immigration Services records within the Enterprise Citizenship and Immigration Services Centralized Operational Repository to locate an Alien Number match using the verified Social Security number. When an Alien Number is found, the Systematic Alien Verification for Entitlements Program will leverage additional information to resolve the case and verify the citizenship or immigration status for the individual. When the name, date of birth, and Alien Number returned match a record indicating the person is a naturalized United States Citizen, the appropriate Systematic Alien Verification for Entitlements Program response is provided to the end user as 'United States Citizen.' When the Alien Number returned does not indicate a United States Citizen, the case is routed to manual review for determining the specific immigration status. For cases where no Alien Number is found through this process, the case is resolved as Immigration Enumerator Required.

**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:

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

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

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

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

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

If a benefit applicant's immigration status/category cannot be verified on initial or additional verification step when submitting a Department of Homeland Security enumerator, the system will prompt the user agency to resubmit the case with documents. When the prompt is received, the agency must upload a copy of the front and back of the immigration document the applicant presented to the user agency for the Systematic Alien Verification for Entitlements Program to perform detailed manual research at third step. A Department of Homeland Security immigration enumerator is required for the third step additional



verification. The Systematic Alien Verification for Entitlements Program cannot complete third step additional verification using non-immigration documentation. The Systematic Alien Verification for Entitlements Program user agencies are legally authorized to make electronic copies of immigration documents for purposes of verifying immigration status. Cases created with just the Social Security number or a passport number as the enumerator are not subject to this step.

If the third step manual review produces relevant information enabling the verification of immigration status/category or United States citizenship, the Systematic Alien Verification for Entitlements Program provides an electronic response to the user agency. If a benefit applicant's immigration status/category is not verified after completing third step verification, the Systematic Alien Verification for Entitlements Program will provide additional information or guidance on how to proceed.

If the applicant believes their information in the Department of Homeland Security records is incorrect, the applicant can seek a records correction. User agencies should provide the Systematic Alien Verification for Entitlements Program Fact Sheet and Systematic Alien Verification for Entitlements Program Records: Fast Facts for Benefit Applicants<sup>12</sup> to benefit applicants that may require records correction.

### **Reporting Capabilities**

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 U.S. 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., Alien 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

<sup>12</sup> The Systematic Alien Verification for Entitlements Fact Sheet and Systematic Alien Verification for Entitlements Records: Fast Fact for Benefits Applicants is accessible at <https://www.uscis.gov/save/benefit-and-license-applicants/resources-for-benefit-and-license-applicants>



covered by the Immigration Reform and Control Act of 1986. This includes voter registration and voter list maintenance purposes, so long as the agency meets the legal requirements for using the Systematic Alien Verification for Entitlements Program and provides the required applicant information, when submitting verification requests.

On January 20, 2025, and March 25, 2025, the President issued Executive Orders 14159, *Protecting the American People Against Invasion*<sup>13</sup> and 14248, *Preserving and Protecting the Integrity of American Elections*<sup>14</sup> respectively. Executive Order 14159 requires the Secretary to “promptly issue guidance to ensure maximum compliance by [Department of Homeland Security] personnel with the provisions of 8 U.S.C. 1373<sup>15</sup> and 8 U.S.C. 1644<sup>16</sup> and ensure that State and local governments are provided with the information necessary to fulfill law enforcement, citizenship, or immigration status verification requirements authorized by law.” Executive Order 14248<sup>17</sup> provides, “Federal laws, such as the National Voter Registration Act (Pub. L. 103-31) and the Help America Vote Act (Pub. L. 107-252), require States to maintain an accurate and current Statewide list of every legally registered voter in the State. Pursuant to the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, Department of Homeland Security/U.S. Citizenship and Immigration Services is required to share database information with States upon request so they can fulfill this duty. 8 U.S.C. 1373(c)<sup>18</sup>.” Executive Order 14159<sup>19</sup> 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 Secretary is also required under Executive Order 14159, in coordination with the Department of Government Efficiency Administrator, to review each State’s publicly available voter registration list and available records concerning voter list maintenance activities as required by 52 U.S.C. 20507<sup>20</sup>, alongside Federal immigration databases and State records requested, including through subpoena where necessary and authorized by law, for consistency with Federal requirements. To support this activity the Attorney General is required to prioritize enforcement of 18 U.S.C. 611<sup>21</sup> and 1015(f)<sup>22</sup> and similar laws that restrict aliens from registering to vote or voting, including through use of: (i) databases or information maintained by the Department of Homeland Security; (ii) State-issued identification records and driver license databases; and (iii) similar records relating to citizenship.

<sup>13</sup> <https://www.federalregister.gov/documents/2025/01/29/2025-02006/protecting-the-american-people-against-invasion>

<sup>14</sup> <https://www.federalregister.gov/documents/2025/03/28/2025-05523/preserving-and-protecting-the-integrity-of-american-elections>

<sup>15</sup> 8 USC 1373 Communication between government agencies and the Immigration and Naturalization Service

<sup>16</sup> 8 USC 1644 Communication between State and local government agencies and Immigration and Naturalization Service

<sup>17</sup> Executive Order 14248 Preserving and Protecting the Integrity of American Elections

<sup>18</sup> 8 USC. 1373(c) Obligation to respond to inquiries

<sup>19</sup> Executive Order 14159 Protecting the American People Against Invasion

<sup>20</sup> 52 USC 20507 Requirements with respect to administration of voter registration

<sup>21</sup> 18 USC 611 Voting by aliens

<sup>22</sup> 18 USC 1015 (f) Naturalization, citizenship or alien registry, whoever knowingly makes any false statement or claims that he is a citizen of the United States in order to register to vote or to vote in any Federal, State, or local election (including an initiative, recall, or referendum)-Shall be fined under this title or imprisoned not more than five years, or both



In accordance with federal statutes and policies, the Department of Homeland Security personnel must, in a timely manner, provide verification or immigration status information in response to inquiries from State and local government agencies to verify or ascertain the citizenship or immigration status of individuals. As required by 8 U.S.C. 1373(c), such inquiries must relate to individuals within the jurisdiction of the State or local government agency and must be for a purpose authorized by law. Department of Homeland Security personnel have been directed to comply, to the maximum extent possible and permissible under law, with Section 1373, considering federal statutory requirements, including the Privacy Act of 1974, 5 U.S.C. 552a<sup>23</sup>, and 8 U.S.C. 1367<sup>24</sup> (special protected class information); as well as other laws, rules, regulations, policies, and requirements regarding verification, information sharing, and confidentiality.

The Systematic Alien Verification for Entitlements Program user agency registration process determines whether a state voter registration agency meets the legal requirements for using the Systematic Alien Verification for Entitlements Program. As part of registering to use Systematic Alien Verification for Entitlements Program, the agency must provide the Systematic Alien Verification for Entitlements Program all applicable legal authorities and voter registration procedures that authorize the agency to engage in voter registration and/or voter list maintenance activities and verify citizenship status before making individual determinations regarding eligibility for voter registration. The U.S. Citizenship and Immigration Services provides information on its public facing website to assist user agencies understand the above referenced requirements.<sup>25</sup>

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

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<sup>26</sup> for whom the U.S. Citizenship and Immigration Services has a record of their citizenship.

<sup>23</sup> 5 USC 552a Records maintained on individuals

<sup>24</sup> 8 USC 1367 Penalties for disclosure of information

<sup>25</sup> The Systematic Alien Verification for Entitlements Voter Registration and Voter List Maintenance Fact Sheet is accessible at <https://www.uscis.gov/save/resources/voter-registration-and-voter-list-maintenance-fact-sheet>.

<sup>26</sup> "Acquired citizenship" refers to U.S. citizenship conveyed to children through the naturalization of parents or, under certain circumstances, at birth to foreign-born children of U.S. citizens, provided certain conditions are met.



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- 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 U.S. Citizenship and Immigration Services.
- The Department of State reviews and adjudicates acquired citizens that may not have a record with the U.S. 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 U.S. Citizenship and Immigration Services per 8 U.S.C. 1373.<sup>27</sup>
- With the newly established connection to the Social Security Administration's Numident system, the Systematic Alien Verification for Entitlements Program is now able to verify more United States citizens, including United States citizens by birth, when a Social Security Number is provided.
- The Systematic Alien Verification for Entitlements Program is conducting discovery work (feasibility assessment) to enable Systematic Alien Verification for Entitlements Program customers such as state-based election boards to submit driver license numbers Driver License numbers to the Systematic Alien Verification for Entitlements Program in lieu of a Social Security number. The Systematic Alien Verification for Entitlements Program would then use the Driver License number and search state driver records via a data partner or service, to ascertain the Social Security number associated with that Driver License number. Once the Systematic Alien Verification for Entitlements Program acquires the Social Security number, the Systematic Alien Verification for Entitlements Program could continue the matching logic by checking the Social Security Administration for a record of citizenship or immigration and proceed with the regular verification process, including a potential check of the Department of State American Citizen Record Query as applicable when a U.S. Citizen indicator is not immediately returned.
- Additionally, Systematic Alien Verification for Entitlements Program user agencies intend to use the program to continuously monitor the citizenship and immigration status of their voter lists which may factor in the death record of an individual from the Social Security Administration.<sup>28</sup>

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

<sup>27</sup> 8 USC 1873 outlines the Communication between government agencies and the Immigration and Naturalization Service.

<sup>28</sup> See <https://www.ohiosos.gov/media-center/press-releases/2025/2025-12-01/>



driver's license. The state voter agency would then follow up with those individuals regarding 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 in question and use the Systematic Alien Verification for Entitlements Program as one method to verify the information. With continuous monitoring, state voter agencies intend to create Systematic Alien Verification for Entitlements Program cases for previously verified United States Citizens to regularly check the Systematic Alien Verification for Entitlements Program for a response indication of death via the Social Security Administration death master file.

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 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 U.S. 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 U.S. 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 U.S. Citizenship and Immigration Services Person Centric Service that the Systematic Alien Verification for Entitlements Program uses are very good, the U.S. 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 U.S. 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 U.S. Citizenship and Immigration Services is not the source agency for Social Security Administration related information. While the U.S. 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.

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

The Information Sharing Agreement between the Department of Homeland Security-U.S. 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 U.S. Citizenship and Immigration Services will only submit verification requests to the Social Security Administration for authorized purposes.

The U.S. 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 U.S. Citizenship and Immigration Services and Social Security Administration executed a Letter of Agreement that identified the authorities for both organizations as well as purposes and the data exchange. U.S. Citizenship and Immigration Services continues to work on documenting 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 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 Social Security number is submitted, the Systematic Alien Verification for Entitlements Program will verify it against information from the Department of State's American Citizen Record Query system. Additionally, the 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 U.S. Citizenship and Immigration Services users can access the American Citizen Record Query data by querying it via a hyperlink on the Consular Consolidated Database webpage. In addition, limited authorized users can also access the American Citizen Record Query data through a direct connection, and the U.S. Citizenship and Immigration Services may receive automated American Citizen Record Query data for use in support of the Verification Information System (VIS), which supports the Systematic Alien Verification for Entitlement Program.

Access to the American Citizen Record Query is provided to U.S. Citizenship and Immigration Services based on its demonstrated need to provide citizenship or immigration status verification to user agencies. Access to data includes, but will not exceed, application number, applicant's name, also known as (AKA) and other names, sex, date of birth, place of birth, Social Security number, address, phone number, and email address; each passport's number, type, date of issuance, date of expiration, and status; the individual's photo as it appears on the application; and images of the first and second page of a passport application. The U.S. Department of Homeland Security access also permits the ability to request and view Consular Report of Birth Abroad records, which shall be treated in the same manner as passport records. The U.S. Citizenship and Immigration Services may share the American Citizen Record Query information to other federal user agencies with equivalent authorized access to passport data for counterterrorism purposes and intelligence functions as authorized by the Department of Homeland Security's agreement with the Department of State.

## **File Sharing with Department of State**

The U.S. Citizenship and Immigration Services fully implemented the Application Programming Interface connection with the Department of State/Consular Consolidated Database/American Citizen Record Query in December 2025. Prior to full implementation, the U.S. Citizenship and Immigration Services manually initiated U.S. citizenship verification with the Department of State, if the Social Security Administration provided information back to the U.S. Citizenship and Immigration Services that either could not verify U.S. citizenship or indicated that the individual was foreign born. The U.S. Citizenship and Immigration Services personnel would extract voter verification case information from the Systematic Alien Verification for Entitlements Program cases (created by customer agencies) and



email spreadsheets in an encrypted Zip file to the Department of State. The information extracted from the voter verification case included, but was not limited to, a U.S. Citizenship and Immigration Services generated number, name, date of birth, and Social Security number (full nine and/or partial), U.S. passport number, and Department of Homeland Security-issued enumerator. The Department of State then compared Verification Division records against passport information. The Department of State returned to U.S. Citizenship and Immigration Services a “match” or “no match” for issuance of a US passport, and if there was a match, included the full name, date of birth, U.S. Passport number, date of issuance, endorsement code (U.S. Citizen or U.S. National indicator), as well as whether it was issued to a U.S. national.

**Monitoring Agency – Reporting Only/Systematic Alien Verification for Entitlements Accounts**

The Systematic Alien Verification for Entitlements Program will support organizations that have legal oversight authority over another program or benefit type supported by the Systematic Alien Verification for Entitlements Program by allowing them to become a user agency. These user agencies may create new cases in their own account based on case data previously created by the overseen or associated user agency.

**User Agencies Memoranda of Agreement**

All user agency Memorandums of Agreement contain similar provisions to protect the due process and other rights of individuals for whom states or other user agencies submit verification requests to the Systematic Alien Verification for Entitlements Program<sup>29</sup>. The U.S. Citizenship and Immigration Services has an online tool that allows the public to search if a federal, state, local, tribal, or territorial agency is registered with the Systematic Alien Verification for Entitlement Program.<sup>30</sup>

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

*Please check all that apply.*

☐ This project does not collect, collect, maintain, use, or disseminate any personally identifiable information<sup>31</sup>

☒ Members of the public

<sup>29</sup> The Systematic Alien Verification for Entitlements Program memorandum of agreement is assessable at <https://www.uscis.gov/save/prospective-user-agencies/register-an-agency-for-save> and under the “How to Register for SAVE” section.

<sup>30</sup> The Systematic Alien Verification for Entitlement Program search tool is accessible at <https://www.uscis.gov/save/save-agency-search-tool>.

<sup>31</sup> DHS defines personal information as “Personally Identifiable Information” or PII, which is any information that permits the identity of an individual to be directly or indirectly inferred, including any information that is linked or linkable to that individual, regardless of whether the individual is a U.S. citizen, lawful permanent resident, visitor to the U.S., or employee or contractor to the Department. “Sensitive PII” is PII, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. For the purposes of this PTA, SPII and PII are treated the same.



|                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                             |
|-------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                 | <input checked="" type="checkbox"/> U.S. Persons (U.S citizens or lawful permanent residents)<br><input checked="" type="checkbox"/> Non-U.S. Persons<br><input checked="" type="checkbox"/> DHS Employees/Contractors (list Components):<br>U.S. Citizenship and Immigration Services<br><input type="checkbox"/> Other federal employees or contractors (list agencies): <i>Click here to enter text.</i> |
| <b>2(a) Is information meant to be collected from or about sensitive/protected populations?</b> | <input type="checkbox"/> No<br><input checked="" type="checkbox"/> 8 USC § 1367 protected individuals (e.g., T, U, VAWA) <sup>32</sup><br><input checked="" type="checkbox"/> Refugees/Asylees<br><input type="checkbox"/> Other. Please list: <i>Click here to enter text.</i>                                                                                                                             |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>3. What specific information about individuals is collected, maintained, used, or disseminated?</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <p>* Items marked with an asterisk are potential, future collections of information.</p> <p><b><u>The Systematic Alien Verification for Entitlements Program may collect the following information from User Agencies about aliens and U.S. citizens:</u></b></p> <ul style="list-style-type: none"><li>• Full Name</li><li>• Date of birth</li><li>• Benefit sought</li><li>• Driver license number*</li><li>• State Identification</li><li>• Citizenship or nationality</li><li>• Country of birth</li><li>• A-Number/Alien Registration Number/Alien Number</li><li>• Social Security number (full or partial)</li><li>• Individual Taxpayer Identification Number*</li><li>• Alias</li></ul> |

<sup>32</sup> This involves the following types of individuals: T nonimmigrant status (Victims of Human Trafficking), U nonimmigrant status (Victims of Criminal Activity), or Violence Against Women Act (VAWA). For more information about 1367 populations, please see: DHS Management Directive 002-02, Implementation of Section 1367 Information Provisions, *available at* <http://dhsconnect.dhs.gov/org/comp/mgmt/policies/Directives/002-02.pdf>.



- Customer Agency-issued Case Number

**Unique Immigration Identifiers Used:**

- Alien number
- U.S. 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 U.S. 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
- U.S. Passport Number
- Agency Data Universal Numbering System

**Other Information:**

- Employment Authorization Document History
  - Grant Date
- Affidavit of Support Sponsor Data<sup>33</sup>
  - Full name
  - Current mailing address - In care of name (if any)
  - Current physical address
  - Country of domicile
  - Date of birth
  - Country of birth
  - Social Security number
  - Immigration Status
  - Sponsors A-number (if any)
  - U.S. Citizenship and Immigration Services Online Account Number (if any)
  - Military service
  - Employment and income

<sup>33</sup> A United States Citizenship and Immigration Services Affidavit of Support sponsor is an individual who signs a legal contract, Form I-864, agreeing to financially support an intending immigrant, ensuring they won't become a public charge. This sponsor is typically the U.S. citizen, lawful permanent resident, or U.S. national who filed the immigrant petition.



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- Federal tax return information
- 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
    - U.S. 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
    - U.S. 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

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- 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)
  - Photo
  - Closed Date
  - Receipt number

**The Systematic Alien Verification for Entitlements may collect 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" - 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

**The Systematic Alien Verification for Entitlements may collect the following information from the Department of State:**

- Match response: Yes/No
- U.S. Passport number
- U.S. Passport card number
- Endorsement code
- U.S. Passport issuance date
- U.S. Passport expiration date
- Consular Report of Birth Abroad status
- Consular Report of Birth Abroad date
- Consular Report of Death Abroad date of death
- Consular Report of Death Abroad data of report



**The Systematic Alien Verification for Entitlements may collect the following information about User Agencies and their personnel (users):**

**User Agency Information:**

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

**The Systematic Alien Verification for Entitlements may provide the following information 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

**The following information may be shared with the Department of State (DOS) for Passport query:**

- Full Name
- Date of Birth
- United States passport number
- Social Security number (full or partial)

**Information Shared with Social Security Administration:**

- Full Name
- Date of Birth
- Social Security Number
- State Identification



|                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>3(a) Does this Project, Program, or System collect, maintain, use, or disseminate Social Security numbers (SSN) or other types of stand-alone sensitive information?<sup>34</sup> If applicable, check all that apply.</b>                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <input checked="" type="checkbox"/> Social Security number<br><input checked="" type="checkbox"/> Alien Number (A-Number)<br><input checked="" type="checkbox"/> Tax Identification Number<br><input checked="" type="checkbox"/> Visa Number<br><input checked="" type="checkbox"/> Passport Number<br><input type="checkbox"/> Bank Account, Credit Card, or other financial account numbers | <input type="checkbox"/> Social Media Handle/ID<br><input checked="" type="checkbox"/> Driver's License/State ID Number<br><input type="checkbox"/> Biometric identifiers ( <i>e.g., FIN, EID</i> )<br><input checked="" type="checkbox"/> Biometrics. <sup>35</sup> <i>Please list modalities (e.g., fingerprints, DNA, iris scans):</i> Photographs<br><input checked="" type="checkbox"/> Other. <i>Please list:</i> Form I-94 number, Student and Exchange Visitor Information System Identification number, Naturalization/Citizenship Certificate number, Permanent Resident Card number, Receipt number, and Visa number.                                                                                                                                                                               |
| <b>3(b) Please provide the specific legal basis for the collection of SSN:</b>                                                                                                                                                                                                                                                                                                                 | <p>The Social Security number is collected from applicants and is used to verify their immigration status/United States citizenship. Div. C, title VI, Section 642 of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, Pub. L. No. 104-208, 110 Stat. 3009-707, codified at 8 U.S.C. 1373 (a) and (c). Authority for having a system for verification of citizenship and immigration status of individuals seeking government benefits is governed by the Immigration Reform and Control Act of 1986 Pub. L. No. 99-603, 100 Stat. 3359.</p> <p>Sections 415 and 642 of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, authorizes the collection and use of Social Security Numbers to verify entitlement to public benefits, licenses, and credentials.</p> |

<sup>34</sup> Sensitive PII (or sensitive information) is PII that if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. More information can be found in the DHS Handbook for Safeguarding Sensitive Personally Identifiable Information, available at <https://www.dhs.gov/publication/handbook-safeguarding-sensitive-personally-identifiable-information>.

<sup>35</sup> If related to IDENT/HART and applicable, please complete all Data Access Request Analysis (DARA) requirements. This form provides privacy analysis for DHS' IDENT, soon to be HART. The form replaces a PTA where IDENT is a service provider for component records. PRIV uses this form to better understand how data is currently shared, will be shared and how data protection within IDENT will be accomplished. IDENT is a biometrics service provider and any component or agency submitting data to IDENT is a data provider.



**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 U.S. Citizenship and Immigration Services will use a truncated Social Security number if provided by the user agency.

**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*,<sup>36</sup> which requires the use of privacy-enhancing SSN alternatives when there are technological, legal, or regulatory limitations to eliminating the SSN? Note: even if you are properly authorized to collect SSNs, you are required to use an alternate unique identifier. If there are technological, legal, or regulatory limitations to eliminating the SSN, privacy-enhancing alternatives should be taken, such as masking, truncating, or encrypting the SSN, or blocking the display of SSNs in hard copy or digital formats.**

The U.S. 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, U.S. 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 that may be natural born U.S. citizens and who do not have an alternative enumerator. The U.S. Citizenship and Immigration Services is working to implement use of the truncated form of a Social Security number (i.e. the last four numbers of a Social Security number rather than the full identifier) to retrieve information from the Social Security Administration.

The Systematic Alien Verification for Entitlements Program's user interface will mask the full Social Security number during data inputs, except for when information is submitted via the bulk uploader. In compliance with the security policy for Social Security numbers, server-side encryption is used for Amazon Simple Storage Service<sup>37</sup> and Amazon Relational Database Services<sup>38</sup> databases. This uses key management provided by Amazon Web Services for the storage buckets and Relational Database Services databases where Social Security numbers are housed. Social Security numbers and Personally Identifiable Information are not exposed in any hard copy documents available for extract from the information system. Additionally, in accordance with the National Institute of Science and Technology and Department of Homeland Security information security and privacy policies, the Systematic Alien

<sup>36</sup> See <https://www.dhs.gov/publication/privacy-policy-instruction-047-01-010-ssn-collection-and-use-reduction>.

<sup>37</sup> Amazon Simple Storage Service (Amazon S3) is an object storage service offering industry-leading scalability, data availability, security, and performance. Organizations can use this service to store, manage, analyze, and protect any amount of data for virtually any use case, such as data lakes, cloud-native applications, and mobile apps.

<sup>38</sup> Amazon Relational Database Service (Amazon RDS) is an easy-to-manage relational database service optimized for total cost of ownership. It is simple to set up, operate, and scale with demand. Amazon RDS automates undifferentiated database management tasks, such as provisioning, configuring, backing up, and patching. Amazon RDS allows customers to create a new database in minutes and offers flexibility to customize databases to meet their needs.



Verification for Entitlements Program maintains moderate level controls for the confidentiality of information within the tool.

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| <p><b>4. How does the Project, Program, or System retrieve information?</b></p> | <p><input checked="" type="checkbox"/> By a unique identifier.<sup>39</sup> Please list all unique identifiers used:</p> <ul style="list-style-type: none"><li>• Full name</li><li>• Alias</li><li>• Date of birth</li><li>• Immigration enumerator:<ul style="list-style-type: none"><li>○ Alien number/U.S. Citizenship and Immigration Services Number,</li><li>○ Form I-94, Arrival/Departure Record number,</li><li>○ Student and Exchange Visitor Information System Identification number,</li><li>○ Citizenship or Naturalization Certificate number</li><li>○ Card Number / I-797 Receipt Number,</li><li>○ Visa Number, or</li><li>○ Foreign passport number (if submitted with another immigration enumerator) and issuing country</li></ul></li><li>• Social Security number</li><li>• United States passport number</li><li>• Customer Agency-issued Case Number</li><li>• Case Verification Number</li></ul> <p><input type="checkbox"/> By a non-unique identifier or other means. Please describe:<br/><i>Click here to enter text.</i></p> |
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| <p><b>5. What is the records retention schedule(s) for the information collected for each category type (include the records schedule number)? <i>If no</i></b></p> | <p>Data within Systematic Alien Verification for Entitlements Program is retained for 10 years after the final match determination of the employee or</p> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|

<sup>39</sup> Generally, a unique identifier is considered any type of "personally identifiable information," meaning any information that permits the identity of an individual to be directly or indirectly inferred, including any other information which is linked or linkable to that individual regardless of whether the individual is a U.S. citizen, lawful permanent resident, visitor to the U.S., or employee or contractor to the Department.



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| <p><i>schedule has been approved, please provide proposed schedule or plans to determine it.</i></p> <p><i>Note: If no records schedule is in place or are unsure of the applicable records schedule, please reach out to the appropriate Records Management Office.<sup>40</sup></i></p> | <p>applicant in accordance with National Archives and Records Administration approved records retention schedule N1-566-08-07.</p> <p>All United States Citizenship and Immigration Services verification requests will be documented in a transactional database. The retention period is 10 years. The database is not accessible to the public, except as permitted.</p> |
| <p><b>5(a) How does the Project, Program, or System ensure that records are disposed of or deleted in accordance with the retention schedule (e.g., technical/automatic purge, manual audit)?</b></p>                                                                                     | <p>Data is automatically purged annually based on National Archives and Records Administration disposal schedule N1-566-08-07.</p>                                                                                                                                                                                                                                          |

|                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| <p><b>6. Does this Project, Program, or System connect, receive, or share PII with any other DHS/Component projects, programs, or systems?<sup>41</sup></b></p> | <p><input type="checkbox"/> No.</p> <p><input checked="" type="checkbox"/> Yes. If yes, please list:</p> <p><b>United States Citizenship and Immigration Services Systems:</b></p> <ul style="list-style-type: none"><li>• Central Index System</li><li>• Electronic Immigration System</li><li>• Computer Linked Application Information Management System 3</li><li>• Enterprise Citizenship and Immigration Services Centralized Operational Repository</li><li>• GLOBAL (not an acronym)</li><li>• RAILS (not an acronym)</li><li>• Customer Profile Management System</li><li>• Salesforce Customer Relationship Management Customer Relationship Management<sup>42</sup></li></ul> |
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<sup>40</sup> See <https://dhsconnect.dhs.gov/org/comp/mgmt/ocio/cdod/rm/Pages/DHS-Records-Officers.aspx>

<sup>41</sup> PII may be shared, received, or connected to other DHS systems directly, automatically, or by manual processes. Often, these systems are listed as “interconnected systems” in IACS.

<sup>42</sup> Provides a unified platform where data from different departments can be accessed and used to improve customer interactions.



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|                                                                                                                                                                     | <p><b>Department of Homeland Security Systems:</b></p> <ul style="list-style-type: none"><li>• Department of Homeland Security OneNet</li><li>• Immigration and Custom Enforcement Student and Exchange Visitor Information System</li><li>• Immigration and Custom Enforcement Integrated Database</li><li>• Customs and Border Protection Arrival and Departure Information System</li><li>• Transportation Security Administration Technology Infrastructure Modernization and Vetting and Credentialing System</li></ul>                                                                                                                                                                                                                                                                                                                                                 |
| <p><b>7. Does this Project, Program, or System connect, receive, or share PII with any external (non-DHS) government or non-government partners or systems?</b></p> | <p><input type="checkbox"/> No.</p> <p><input checked="" type="checkbox"/> Yes. If yes, please list:</p> <p>The following are systems/organizations that the Systematic Alien Verification for Entitlements Program collects/shares information to support user agencies' requests:</p> <ul style="list-style-type: none"><li>• United States Military Entrance Processing Command Integrated Resource System</li><li>• Department of Education Federal Student Aid Central Processing System</li><li>• Department of Health and Human Services Centers for Medicare &amp; Medicaid Services</li><li>• Social Security Administration Numident system</li><li>• Department of Justice Executive Office for Immigration's Immigration Review Information Exchange System</li><li>• Department of State Consular Consolidated Database/American Citizen Record Query</li></ul> |



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



|                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                  |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>10. Does this Project, Program, or System use or collect data involving or from any of the following technologies:</b>                                                                                                                                                                                                                                       | <input type="checkbox"/> Social Media<br><input type="checkbox"/> Advanced analytics <sup>43</sup><br><input type="checkbox"/> Live PII data for testing<br><input checked="" type="checkbox"/> No                               |
| <b>11. Does this Project, Program, or System use data to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly indicative of terrorist or criminal activity on the part of any individual(s) (i.e., data mining)?<sup>44</sup> This does not include subject-based searches.</b> | <input checked="" type="checkbox"/> No.<br><input type="checkbox"/> Yes. If yes, please elaborate: <i>Click here to enter text.</i>                                                                                              |
| <b>11(a) Is information used for research, statistical, or other similar purposes? If so, how will the information be de-identified, aggregated, or otherwise privacy-protected?</b>                                                                                                                                                                            | <input checked="" type="checkbox"/> No.<br><input type="checkbox"/> Yes. If yes, please elaborate: <i>Click here to enter text.</i>                                                                                              |
| <b>12. Does the planned effort include any interaction or intervention with human subjects<sup>45</sup> via pilot studies, exercises, focus groups, surveys, equipment or technology, observation of public</b>                                                                                                                                                 | <input checked="" type="checkbox"/> No.<br><input type="checkbox"/> Yes. If yes, please reach out to the DHS Compliance Assurance Program Office (CAPO) for <u>independent</u> review and approval of this effort. <sup>46</sup> |

<sup>43</sup> The autonomous or semi-autonomous examination of Personally Identifiable Information using sophisticated techniques and tools to draw conclusions. Advanced Analytics could include human-developed or machine-developed algorithms and encompasses, but is not limited to, the following: data mining, pattern and trend analysis, complex event processing, machine learning or deep learning, artificial intelligence, predictive analytics, big data analytics.

<sup>44</sup> Is this a program involving pattern-based queries, searches, or other analyses of one or more electronic databases, where—

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

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

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

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

(ii) the security of a Government computer system.

<sup>45</sup> Human subject means a living individual about whom an investigator conducting research: (1) obtains information or biospecimens through intervention or interaction with the individual, and uses, studies, or analyzes the information or biospecimens; or (2) obtains, uses, studies, analyzes, or generates identifiable private information or identifiable biospecimens.

<sup>46</sup> For more information about CAPO and their points of contact, please see: <https://www.dhs.gov/publication/caipo> or <https://collaborate.st.dhs.gov/orgs/STCSSites/SitePages/Home.aspx?orgid=36>. For more information about the protection of human subjects,



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| <b>behavior, review of data sets, etc. for research purposes</b>                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>13. Does the Project, Program, or System provide role-based or additional privacy training for personnel who have access, <u>in addition</u> to annual privacy training required of all DHS personnel?</b> | <input checked="" type="checkbox"/> No.<br><input type="checkbox"/> Yes. If yes, please list: <i>Click here to enter text.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>14. Is there a FIPS 199 determination?<sup>47</sup></b>                                                                                                                                                    | <input type="checkbox"/> No.<br><input checked="" type="checkbox"/> Yes. Please indicate the determinations for each of the following:<br><br>Confidentiality:<br><input type="checkbox"/> Low <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined<br><br>Integrity:<br><input type="checkbox"/> Low <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined<br><br>Availability:<br><input type="checkbox"/> Low <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined |

## PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE REVIEWER)

|                                                  |                           |                            |
|--------------------------------------------------|---------------------------|----------------------------|
| <b>Component Privacy Office Reviewer:</b>        | <div></div>               |                            |
| <b>Component Privacy Office Senior Reviewer:</b> |                           | (b)(6) (b)(7)(C) (b)(7)(F) |
| <b>PROTECT ID Number:</b>                        | Click here to enter text. |                            |

please see DHS Directive 026-04: [https://www.dhs.gov/sites/default/files/publications/mgmt/general-science-and-innovation/mgmt-dir\\_026-04-protection-of-human-subjects\\_revision-01.pdf](https://www.dhs.gov/sites/default/files/publications/mgmt/general-science-and-innovation/mgmt-dir_026-04-protection-of-human-subjects_revision-01.pdf).

<sup>47</sup> FIPS 199 is the Federal Information Processing Standard Publication 199, Standards for Security Categorization of Federal Information and Information Systems and is used to establish security categories of information systems. For more information, see <https://www.nist.gov/itl/fips-general-information>.

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| <b>Date submitted to Component Privacy Office:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>February 20, 2026</b>  |
| <b>Concurrence from other Component Reviewers involved (if applicable):</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Click here to enter text. |
| <b>Component Privacy Office Recommendation:</b><br><i>Please include recommendation below, including what new privacy compliance documentation is needed, as well as any specific privacy risks/mitigations, as necessary.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                           |
| <p>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. The U.S. Citizenship and Immigration Services expanded the use of the Systematic Alien Verification for Entitlements to include verification of citizenship for natural born United States citizens.</p> <p><b><u>February 2026 Updates</u></b></p> <p>This Privacy Threshold Analysis documents the following changes to the Systematic Alien Verification for Entitlements Program:</p> <ol style="list-style-type: none"><li><b>Update to Phase Four (4) to replace a proposed connection with Customs and Border Protection with a new direct connection to the Department of State's Consular Consolidated Database / American Citizen Record Query system, to search passport and U.S. citizenship information.</b> (Implemented – December 2025) Prior to implementation of the automated process, the Systematic Alien Verification for Entitlements Program used a manual information sharing process. This manual information sharing with the Department of State (using spreadsheets via email or other medium) occurred between October 2025 and December 2025. Information provided to the Department of State within the spreadsheets included: First Name, Last Name, Date of Birth, and Social Security Number. In return Department of State, provided the same returning biographic data elements and the U.S. Passport Number, Issuance Date, and related endorsement code where applicable. Once information was received from the Department of State, Systematic Alien Verification for Entitlements Program cases were manually updated when information returned confirmed the individual to be a United States Citizen per the Department of State. The query of the Department of State /American Citizen Record Query through the Verification Data Integration Services data was included as part of the automated Systematic Alien Verification for Entitlements process using a direct connection via Application Programming Interface in December 2025.</li><li><b>Added Monitoring Agency – Reporting Only Account.</b> User agencies with legal authority to monitor and audit benefits granted may view case data such as biographic data, enumerators, case submission date/time, and the System Alien Verification for Entitlements Program response information using this new account type. Reporting options exist for individual agencies and their case data.</li></ol> |                           |



3. **Individual Taxpayer Identification Number** – The Individual Taxpayer Identification Number was added to the now published Systematic Alien Verification for Entitlements Privacy Impact Assessment and System of Records Notice published on October 30, 2025. This Privacy Threshold Analysis documents the potential to collect the Individual Taxpayer Identification Number as an alternate identifier from user agencies. However, the Individual Taxpayer Identification Number is not issued by the Social Security Administration, it is issued by the U.S. Department of the Treasury.
4. **Removing Nlets as the preferred data provided for Driver's License information.** Use of Nlets was added to the now published Systematic Alien Verification for Entitlements Privacy Impact Assessment and System of Records Notice published on October 30, 2025. Research and discovery of possible connections to new data partners enabling access to Driver's License information is being conducted to enable Systematic Alien Verification for Entitlements Program users to create cases using Name, Date of Birth, and a Driver's License number. The Systematic Alien Verification for Entitlements Program would potentially use Driver License numbers to query the issuing authority (state or territory) to acquire the subject's federal enumerator such as the Social Security number or Alien Number and then combine that information with other Systematic Alien Verification for Entitlements Program data to continue the process to verify citizenship or immigration status. The previous Privacy Threshold Analysis included reference to National Law Enforcement and Telecommunication System (NLETS) which is now referred to as Nlets (not an acronym). While the U.S. Citizenship and Immigration Services continues to explore the future potential for leveraging a state issued identifier such as a Driver License number for accessing records to determine citizenship and immigration status, there are a variety of options for sourcing this information. This Privacy Threshold Analysis amends the previous proposal that describes Nlets as a data source. Nlets is an information broker service and does not store driver's license data. This work is exploratory at this time whereby any development or implementation will be included in a future Privacy Threshold Analysis. (Estimated Completion Date: To be determined)
5. **Added new Social Security Number search within the Enterprise Citizenship and Immigration Services Centralized Operational Repository to Identify Alien Number for certain cases submitted without a provided Alien Number.** In scenarios where an Alien Number is not provided by the agency or when the Alien Number is not provided by the Social Security Administration when records match and indicate the individual is foreign born, the Systematic Alien Verification for Entitlements Program will search the U.S. Citizenship and Immigration Services records within the Enterprise Citizenship and Immigration Services Centralized Operational Repository to locate an Alien Number match using the verified Social Security number. When an Alien Number is found, the Systematic Alien Verification for Entitlements Program will leverage that additional information to resolve the case and verify the citizenship or immigration status for the individual. When the name, date of birth, and Alien Number returned match a record indicating the person is a naturalized United States Citizen, the appropriate Systematic Alien Verification for Entitlements Program response is provided to the end user as United States Citizen. When the Alien Number returned does not indicate a United States Citizen, the case is routed to manual review for determining the specific immigration



status. For cases where no Alien Number is found through this process, the case is resolved as Immigration Enumerator Required.

6. **Enhanced Voter List Maintenance benefit category to enable User Agencies to Submit Recurring Voter Verification Cases to Receive Updated Information.** The Systematic Alien Verification for Entitlements Program provides multiple capabilities for applicable agencies to leverage the Systematic Alien Verification for Entitlements Program benefit categories that align with their use cases for verifying citizenship and immigration status for voter verification. The Voter Registration benefit category will be used for verifying initial citizenship and immigration status for purposes of being on the voter registration roll, while the Voter List Maintenance benefit category will be used for re-checking previously resolved voter verification cases to receive updated information such as a match to the death master file. The primary change is to the Voter List Maintenance benefit category which will provide a systematic response only and prevent cases from being auto escalated to manual review.
7. **Updates to the Web Services Interface Control Agreement, Development of Version 38.** The Systematic Alien Verification for Entitlements Program is planning to update its Web services interface control agreement for its user agencies. The new web services version, 38, will update the responses provided to users which enhances the Systematic Alien Verification for Entitlements Program query logic to provide more accurate information based on the need to know. Updates in web services version 38 will include: transfer from legacy Simple Object Access Protocol (SOAP) Application Programming Interface to modern Representational State Transfer (REST) architecture; ability to create cases with additional enumerators; new initial response structure for immigration status and employment authorization that aligns with manual verification responses, improved accuracy, and additional case processing information; and automated escalations to additional verification when applicable. (Projected deployment of Web services version 38 is by April 2026)
8. **Manual Reports from Systematic Alien Verification for Entitlements records to support Public Charge.** The Systematic Alien Verification for Entitlements records will be used to produce manual reports identifying pending Forms I-485 and associated Form I-864 with corresponding Systematic Alien Verification for Entitlements Program queries for federal means-tested benefits.<sup>48</sup> This information will inform appropriate bases of further inquiry during adjudication and as a prompt to seek additional information, including reaffirmation by the applicant that information provided on the application are accurate<sup>49</sup> and independent confirmation of applicant responses from benefit granting agencies or other sources. The Systematic Alien Verification for Entitlements Program information will not be used directly in adjudicative processes or as evidence supporting adjudicative determination. This effort supports Policy Memorandum PM-602-0190 from the U.S. Citizenship and Immigration Services reaffirming for officers and the public our commitment to the faithful implementation of the public charge ground of inadmissibility within the current framework and in conjunction with

<sup>48</sup> Applicants exempt from public charge requirements were not included.

<sup>49</sup> Form I-485, Page 19, Question 63 asks about Supplemental Security Income (SSI), Temporary Assistance for Needy Families (TANF), and other cash assistance. Form I-485, Page 19, Question 64 asks about long-term institutionalization at government expense.



ongoing rulemaking efforts.<sup>50</sup> In January 2026 the U.S. Citizenship and Immigration Services began a pilot of this process beginning with two states.

- 9. Systematic Alien Verification for Entitlements Connections.** Previous versions of the Systematic Alien Verification for Entitlements Program Privacy Threshold Analysis documented a connection to the Reengineered Naturalization Application Casework System and Marriage Fraud Amendment (MFA) System. The Verification Information System's Information System Security Officer has indicated that the Systematic Alien Verification for Entitlements Program does not connect to or receive information from these two systems, thus they are being removed from this document.

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

### **Privacy Impact Assessment**

- A new Privacy Impact Assessment Update for DHS/USCIS/PIA-006 Systematic Alien Verification for Entitlements Program must be completed before collection and use of additional information. Specifically, these Privacy Impact Assessment updates would include, but are not limited to, all updates documented within this Privacy Threshold Analysis and the removal of any reference to the collection of the Individual Taxpayer Identification Number and Nlets as a data source.

### **System of Records Notice**

- An update to DHS/USCIS-004 Systematic Alien Verification for Entitlements Program to ensure all changes documented within this Privacy Threshold Analysis are documented and to remove the Individual Taxpayer Identification Number from the categories of records and reference to the Nlets.
- DHS/CBP-011 Customs and Border Protection Primary and Secondary Processing (TECS (not an acronym)) National SAR Initiative December 19, 2008 (73 Federal Register 77778)
- STATE-26 Passport Records, March 24, 2015 (80 Federal Register 15653)
- STATE-39 Visa Records, November 8, 2021 (86 Federal Register 61822)

<sup>50</sup> See *Public Charge Ground of Inadmissibility*, 90 FR 52168 (Nov. 19, 2025).



- SSA-60-0058 Master Files of Social Security Number Holders and Social Security Number Applications, February 20, 2025 (90 Federal Register 10025)

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

An updated Privacy Threshold Analysis should also provide, at a minimum, the following updates:

- New status types that Systematic Alien Verification for Entitlements Program may provide to the user agencies and how any additional verification is completed.
- A discussion about the update to the user Memorandums of Agreement and the creation of the voter verification specific Memorandum of Agreement.
- A description of how the information received via the integration with the Department of Justice to enable an incarceration/felony related flag will be used internally and if any related information will be sent to the user agencies or the applicants.
- Clarification regarding user agency benefit applicants accessing the Systematic Alien Verification for Entitlements Program.
- Additional information regarding notification provided to United States citizens regarding user agencies use of their information.
- What information may be provided to the user agency about the Section 1367 status of an individual.
- Discussion of if there could be instances when a natural born United States citizen is unable to be verified based on the data available. Also, if all United States citizens would be able to be verified via the Social Security Administration information.
- Confirmation of if there are additional responses (besides Lawful Status, No Lawful Status, or Deceased) provided to user agencies now that United States citizens can also be verified.
- Confirmation of if information from the previously decommissioned Reengineered Naturalization Application Casework System is still accessed via historical data maintained in other U.S. Citizenship and Immigration Services systems.

The following items from the previous action plan have been addressed, removed or overcome by events:

- Additional use case information for the Systematic Alien Verification for Entitlements Program use of Department of State information from the USPassportRESTService and the Department of State's Consular Consolidated Database / American Citizen Record Query system.



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- The U.S. Citizenship and Immigration Services now connects directly to the Department of State versus through the Customs and Border Protection.
- Confirm all responses from the Customs and Border Protection via the use of their USPassportRESTService when matching United States Passport numbers.
  - The U.S. Citizenship and Immigration Services now connects directly to the Department of State versus through the Customs and Border Protection.
- If the Systematic Alien Verification for Entitlements Program will use the existing connection by the E-Verify Program to the USPassportRESTService or will it be a new connection.
  - The U.S. Citizenship and Immigration Services now connects directly to the Department of State versus through the Customs and Border Protection.
- A discussion of Customs and Border Protection authority/purpose for collecting United States Passport related photographs and collection of those photographs by the United States Citizenship and Immigration Services.
  - The U.S. Citizenship and Immigration Services now connects directly to the Department of State versus through the Customs and Border Protection.
- A discussion of any updates regarding any new agreements between Department of State and Customs and Border Protection for the sharing and use of United States Passport number information.
  - The U.S. Citizenship and Immigration Services now connects directly to the Department of State versus through the Customs and Border Protection.



**(TO BE COMPLETED BY THE COMPONENT PRIVACY OFFICE APPROVER)**

|                                           |                                          |
|-------------------------------------------|------------------------------------------|
| <b>Component Privacy Office Approver:</b> | [redacted]                               |
| <b>PTA Approval Date:</b>                 | April 1, 2026 (b)(6) (b)(7)(C) (b)(7)(F) |
| <b>PTA Expiration Date:</b>               | July 1, 2026                             |

**DESIGNATION**

|                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Privacy Sensitive System:</b>                                                                                                                                                             | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Category of System:</b>                                                                                                                                                                   | System<br>If “other” is selected, please describe: <i>Click here to enter text.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Determination:</b>                                                                                                                                                                        | <input type="checkbox"/> Project, Program, System in compliance with full coverage.<br><input checked="" type="checkbox"/> Project, Program, System in compliance with interim coverage.<br><input type="checkbox"/> Project, Program, System in compliance until changes implemented.<br><input type="checkbox"/> Project, Program, System not in compliance.                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>PIA:</b>                                                                                                                                                                                  | <b>PIA Update is required.</b> <ul style="list-style-type: none"><li>DHS/USCIS/PIA-006 Systematic Alien Verification for Entitlement Program<ul style="list-style-type: none"><li>This PIA must be updated to document all identified system/programmatic changes.</li></ul></li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>SORN:</b>                                                                                                                                                                                 | <b>SORN update is required.</b> <ul style="list-style-type: none"><li>DHS/USCIS-004 Systematic Alien Verification for Entitlements Program, May 27, 2020 (85 FR 31798)<ul style="list-style-type: none"><li>This SORN must be updated to document all identified changes.</li></ul></li><li>DHS/CBP-011 Customs and Border Protection Primary and Secondary Processing (TECS (not an acronym)) National SAR Initiative December 19, 2008 (73 Federal Register 77778)</li><li>STATE-26 Passport Records, March 24, 2015 (80 Federal Register 15653)</li><li>STATE-39 Visa Records, November 8, 2021 (86 Federal Register 61822)</li><li>SSA-60-0058 Master Files of Social Security Number Holders and Social Security Number Applications, February 20, 2025 (90 Federal Register 10025)</li></ul> |
| <b>DHS Component Privacy Office Adjudication:</b><br><i>Please describe rationale for privacy compliance determination above, and any further action(s) that must be taken by Component.</i> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

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The U.S. Citizenship and Immigration Services Office of Privacy is submitting this Privacy Threshold Analysis to document the Systematic Alien Verification for Entitlements (SAVE) Program. The Systematic Alien Verification for Entitlements Program is an intergovernmental initiative using a web-based service to help federal, state, territorial, tribal and local benefit-issuing and licensing agencies and other governmental entities determine the immigration status or United States citizenship of applicants for public benefits, licenses, grants, credentials, background investigations, and other lawful purposes, so only entitled applicants receive them. The Systematic Alien Verification for Entitlements Program also enables user agencies to continuously monitor United States citizens for both changes in citizenship status and indicators of death.

The Systematic Alien Verification for Entitlements Program verifies immigration status/category and United States citizenship against Department of Homeland Security-accessed records. The Systematic Alien Verification for Entitlements Program is not a database but queries Department of Homeland Security-accessed federal records to provide registered user agencies with a verification response. The Systematic Alien Verification for Entitlements Program does not determine an applicant's eligibility for a specific benefit or license, as this is the responsibility of the benefit/license granting agency.

This Privacy Threshold Analysis is being submitted to document multiple updates and planned updates to the Systematic Alien Verification for Entitlements Program as part of the comprehensive optimization of the Systematic Alien Verification for Entitlements Program to ensure a single, reliable source for verifying immigration status and United States citizenship nationwide. This Privacy Threshold Analysis documents the following key changes:

1. Updated Phase Four (4) to replace a proposed connection with Customs and Border Protection with a new direct connection to the Department of State's Consular Consolidated Database / American Citizen Record Query system, to search passport and U.S. citizenship information.
2. Added a Monitoring Agency – Reporting Only Account for user agencies with a legal authority to monitor and audit benefits granted to view case data and response information.
3. Added the Individual Taxpayer Identification Number as an alternate identifier from user agencies. Also clarified that the Individual Taxpayer Identification Number is not issued by the Social Security Administration, it is issued by the U.S. Department of the Treasury.
4. Removed Nlets as the preferred data provided for Driver's License information. U.S. Citizenship and Immigration Services continues to explore the future potential for leveraging a state issued identifier such as a Driver License number for accessing records to determine citizenship and immigration status.
5. Added a new Social Security Number search within the Enterprise Citizenship and Immigration Services Centralized Operational Repository to Identify Alien Number for certain cases submitted without a provided Alien Number.
6. Added the Enhanced Voter List Maintenance benefit category to enable User Agencies to Submit Recurring Voter Verification Cases to Receive Updated Information. The Voter Registration

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benefit category will be used for verifying initial citizenship and immigration status for purposes of being on the voter registration roll, while the Voter List Maintenance benefit category will be used for re-checking previously resolved voter verification cases to receive updated information such as a match to the death master file.

7. Updates to the Web Services Interface Control Agreement, Development of Version 38. Updates in web services version 38 will include: transfer from legacy Simple Object Access Protocol (SOAP) Application Programming Interface to modern Representational State Transfer (REST) architecture; ability to create cases with additional enumerators; new initial response structure for immigration status and employment authorization that aligns with manual verification responses, improved accuracy, and additional case processing information; and automated escalations to additional verification when applicable.
8. Creation of Manual Reports from Systematic Alien Verification for Entitlements records to support Public Charge initiatives. The Systematic Alien Verification for Entitlements Program records will be used to produce manual reports identifying pending Forms I-485 and associated I-864 with corresponding Systematic Alien Verification for Entitlements queries for federal means-tested benefits to inform further inquiry during immigration benefit request adjudication.
9. Removed reference to connections to the Reengineered Naturalization Application Casework System and Marriage Fraud Amendment (MFA) System as the Systematic Alien Verification for Entitlements Program does not connect to or receive information from these two systems.

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

The United States Citizenship and Immigration Services Office of Privacy recommends Privacy Impact Assessment coverage for the Systematic Alien Verification for Entitlements Program to comply with the eGovernment Act of 2002 as it “collects, maintains, or disseminates information that is in an identifiable form.” The information collected, used, stored, and/or disseminated by the Systematic Alien Verification for Entitlements Program meets the definition of Personally Identifiable Information (“PII”)/Sensitive Personally Identifiable Information (“SPII”)<sup>51</sup> as it “permits the identity of an individual to be directly or indirectly inferred, including any other information that is linked or linkable to that individual, regardless of whether that individual is a United States citizen, legal permanent resident, or a visitor to the United States, or employee or contractor to the Department.” Specifically, the Systematic Alien Verification for Entitlements Program involves information from members of the public applying for benefits, licenses, or

<sup>51</sup> Personally Identifiable Information (PII) has numerous official definitions, but in general, it is defined as any information that can be used to identify an individual directly or indirectly, such as a name, email address, Social Security Number or IP address. Sensitive PII (SPII) is generally defined as any PII that if lost, stolen, or disclosed without authorization could result in significant harm to an individual.



other authorized purposes which may include (1) United States citizens and legal permanent residents, (2) individuals who are now current United States citizens and legal permanent residents after previously naturalizing or adjusting their status, or (3) individuals who may ultimately naturalize to become United States citizens or adjust their status to receive legal permanent residency in the future. Depending on the eligibility category certain individuals may be eligible to apply for adjustment of status as soon as one (1) year after their initial immigration benefit is granted,<sup>52</sup> therefore the United States Citizenship and Immigration Services Office of Privacy recommends requiring Privacy Impact Assessment coverage for the Systematic Alien Verification for Entitlements Program to ensure all current and future United States citizens and legal permanent residents have transparency into how the United States Citizenship and Immigration Services may collect, store, use, and share the information they previously provided to the United States Citizenship and Immigration Services.

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

- DHS/USCIS/PIA-006 Systematic Alien Verification for Entitlement Program
  - **For the Systematic Alien Verification for Entitlement Program to be in full compliance with the eGovernment Act of 2002, this Privacy Impact Assessment must be updated to reflect the identified system and programmatic changes along with a privacy risk assessment of these changes including but not limited to new collections of data, new system uses and benefit categories, new system connections, new data sharing, new information uses, and the reporting functionality for use with Public Charge initiatives.**

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

- DHS/USCIS-004 Systematic Alien Verification for Entitlements Program, May 27, 2020 (85 FR 31798)
  - **For the Systematic Alien Verification for Entitlement Program to be in full compliance with the Privacy Act of 1974, this System of Records Notice must be updated to reflect the identified system and programmatic changes including but are not limited to updates in the Purpose, Categories of Records, and the Sources of Records sections.**
- DHS/CBP-011 Customs and Border Protection Primary and Secondary Processing (TECS (not an acronym)) National SAR Initiative December 19, 2008 (73 Federal Register 77778)

<sup>52</sup> For more information on eligibility categories please refer to: <https://www.uscis.gov/green-card/green-card-eligibility-categories>.



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- STATE-26 Passport Records, March 24, 2015 (80 Federal Register 15653)
- STATE-39 Visa Records, November 8, 2021 (86 Federal Register 61822)
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While there are currently published System of Records Notices and Privacy Impact Assessments associated with the Systematic Alien Verification for Entitlement Program, these documents do not sufficiently provide full coverage for the recently implemented and planned system and programmatic changes documented in this Privacy Threshold Analysis. Therefore, an updated Privacy Impact Assessment and an updated System of Records Notice must be published as soon as possible for the Systematic Alien Verification for Entitlement Program to be fully compliant with both the eGovernment Act and the Privacy Act. Interim coverage will be provided for three (3) months while the updated Privacy Impact Assessment and System of Records Notice are being drafted and submitted to DHS Privacy. This interim coverage is only granted for the programmatic changes documented in the Privacy Impact Assessment and System of Records Notice which are currently being drafted for DHS Privacy review.

Any programmatic changes not included in the scope of this Privacy Threshold Analysis will require an update to the Privacy Threshold Analysis to ensure sufficient privacy risk analysis can be completed and any further compliance documentation update requirements can be identified. Further, any programmatic changes to the Systematic Alien Verification for Entitlements Program not documented in these two privacy compliance documents, will require additional updates to the Privacy Impact Assessment and System of Records Notice to be completed and submitted to DHS Privacy prior to receiving additional interim coverage.

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