



**Homeland  
Security**

February 22, 2022

**TASKING MEMORANDUM**

MEMORANDUM FOR THE CHAIRPERSON OF THE DATA PRIVACY AND INTEGRITY ADVISORY COMMITTEE

FROM:

Lynn Parker Dupree  
Chief Privacy Officer

A handwritten signature in black ink that reads "Lynn Parker Dupree".

SUBJECT:

**Commercial Data Framework**

The Data Privacy and Integrity Advisory Committee (DPIAC) is charged with providing advice at the request of the Secretary and the Chief Privacy Officer of the U.S. Department of Homeland Security (DHS) (hereinafter “the Chief Privacy Officer”) on programmatic, policy, operational, security, administrative, and technological issues within DHS that relate to personally identifiable information (PII), as well as data integrity, transparency, information sharing, and other privacy-related matters.

Commercial data is used in a variety of the federal government’s missions, including assisting in the conduct of criminal investigations, locating noncitizens and fugitives, researching assets held by individuals of interest, and detecting immigration fraud. It may include location data or data aggregated from a variety of sources. Commercial data may also bolster a noncitizen’s case, help resolve questions involving conflicting information, and provide data important to DHS research, development, testing, and evaluation.

In 2005, the Committee issued Report Number 2005-01, *The Use of Commercial Data to Reduce False Positives in Screening Programs*, which made thirteen recommendations, including that commercial data only be used when necessary to satisfy a defined purpose, that the minimization principle is used, and that access to the data is tightly controlled. In 2006, the Committee issued Report Number 2006-03, *The Use of Commercial Data*, which made additional recommendations to supplement the 2005 report. The recommendations included finding that the definition of Commercial Data should not exclude: (a) Publicly Available Data, data in the public domain that can be obtained or accessed from publicly available sources, both public and private, and (b) Public Record Data, data collected and maintained by a government entity for a public purpose and used outside of that public purpose. The amount and category of data available to DHS has changed significantly from the time these reports were issued and it may be necessary to reassess the use of commercial data at DHS.

To build on the Committee’s work in the commercial data area, I request that the DPIAC:

- Provide their views and recommendations on a governance policy and framework related to the use of commercial data in federal programs.

Please work with the DPIAC Designated Federal Official to facilitate work on this request.

Thank you.