



Privacy Impact Assessment

for

Hummingbird

DHS Reference No. DHS/ALL/PIA-093

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**Homeland
Security**



Abstract

On August 29, 2021, President Biden directed the Department of Homeland Security (DHS) to lead implementation of ongoing efforts across the federal government to support vulnerable Afghans, including those who worked alongside the United States in Afghanistan for the past two decades, as they safely resettle in the United States.¹ These coordinated efforts are collectively known as Operation Allies Welcome (OAW). Leadership of the program is transitioning from the Department of State (State) to DHS. In order to support its OAW responsibilities, DHS will use the Hummingbird application as a tool for tracking, screening, processing, and resettling individuals coming from Afghanistan who prior to arrival are neither U.S. citizens nor lawful permanent residents. This Privacy Impact Assessment (PIA) is being conducted to analyze the privacy risks associated with the collection of personally identifiable information (PII) necessary for the success of OAW and to document the mitigation strategies implemented to ensure adequate protection of OAW participants' privacy.

Introduction

OAW is the federal government's coordinated effort to support and resettle vulnerable Afghans, including those who worked on behalf of the United States. The federal government is working closely with state and local partners to relocate domestic "safe haven" operations² from Department of Defense (DoD) installations to a single non-DoD domestic facility, while continuing to fully screen, vet, and parole Afghans into the United States through OAW. OAW-eligible Afghans complete screening and processing at safe haven locations before being connected with Resettlement Agencies and partners who help them move to new communities.

DHS established a Unified Coordination Group (UCG) consisting of numerous federal agencies—such as State and Department of Health and Human Services (HHS)—to lead the effort and collaborate with state and local governments, non-profit organizations, and the private sector (e.g., Resettlement Agencies). The Unified Coordination Group reports directly to the Secretary of Homeland Security and coordinates the implementation of a broad range of services, including initial processing, COVID-19 testing, isolation of COVID-positive individuals, vaccinations, additional medical services, and screening and support.

¹ See Presidential Memorandum, *Memorandum on the Designation of the Department of Homeland Security as Lead Federal Department for Facilitating the Entry of Vulnerable Afghans into the United States* (August 29, 2021), available at <https://www.whitehouse.gov/briefing-room/statements-releases/2021/08/29/memorandum-on-the-designation-of-the-department-of-homeland-security-as-lead-federal-department-for-facilitating-the-entry-of-vulnerable-afghans-into-the-united-states/>.

² Safe havens are generally U.S. Government facilities or installations where individuals processed through OAW are temporarily housed before they can be placed into new homes through the resettlement process. In the past, safe havens have included Fort McCoy, Wisconsin; Marine Corps Base Quantico, Virginia; and Holloman Air Force Base, New Mexico.



In order to coordinate and implement these services, DHS uses the Hummingbird application. Hummingbird is a cloud-based case management and task tracking system for processing Afghan refugees. The application is supported by ServiceNow and performs data collection, activity tracking, data sharing, and reporting functions. The Hummingbird application was originally developed and implemented by State, but is being migrated to DHS.

Operation Allies Welcome Background and Process (“Phase 1”)

On July 30, 2021, the White House issued a formal statement announcing the Operation Allies Refuge (OAR) effort to support the relocation of eligible Afghan nationals and their immediate families who supported the U.S. Government and applied for a Special Immigrant Visa (SIV) due to the humanitarian crisis that followed the fall of the Afghan government.³ All Afghan Special Immigrant applicants completed a multi-agency security screening process and were then airlifted to the United States where they were temporarily housed by DoD while they completed their Special Immigrant requirements.

An August 2021 Presidential Memorandum ordered a continuation of Operation Allies Refuge through OAW, with the task of managing the resettlement of *all* Afghan refugees and providing temporary housing, sustainment, and support inside the United States. As part of the initial OAW efforts, several operational phases were established:

- Screening and Vetting Prior to Arrival in the United States
- Humanitarian Parole
- Special Immigrant Visas
- COVID-19 Testing, Vaccinations, and Other Medical Services
- Processing at U.S. Military Facilities and USCIS Support
- Applying for Immigration Status, Work Authorization, and Essential Coverage
- Resettlement Processing

Screening and Vetting Prior to Arrival in the United States

To conduct initial screening and vetting of Afghan nationals, DHS deployed approximately 400 personnel from U.S. Customs and Border Protection (CBP), U.S. Immigration and Customs

³ State has authority to issue Special Immigrant Visas to Afghan nationals who assisted the U.S. Government under section 602(b) of the Afghan Allies Protection Act of 2009. For more information on this Special Immigrant Visa process, please see <https://travel.state.gov/content/travel/en/us-visas/immigrate/special-immig-visa-afghans-employed-us-gov.html>. Section 1059 of the National Defense Authorization Act for Fiscal Year 2006 authorizes the issuance of Special Immigrant Visas to Afghan translators and interpreters working for the U.S. military and who meet certain requirements. Please see <https://travel.state.gov/content/travel/en/us-visas/immigrate/siv-iraqi-afghan-translators-interpreters.html> for more information.



Enforcement (ICE), Transportation Security Administration (TSA), United States Coast Guard (USCG), and United States Secret Service (USSS) to Bahrain, Germany, Kuwait, Italy, Qatar, Spain, and the United Arab Emirates to conduct processing, screening, and vetting in coordination with DoD, State, and other federal agencies, and to conduct interviews, as needed. The screening and vetting process involved biometric and biographic screenings conducted by intelligence, law enforcement, and counterterrorism professionals from DHS and DoD, as well as the Federal Bureau of Investigation (FBI), National Counterterrorism Center (NCTC), and additional intelligence community partners. The process included reviewing fingerprints, photographs, and other biometric and biographic data for every single Afghan before they were cleared to travel to the United States. As with other arrivals at U.S. ports of entry, Afghan nationals underwent a primary inspection when they arrived at a U.S. airport, and a secondary inspection when circumstances required. DHS, and the other relevant federal agencies, conducted screening and vetting using their normal processes to fulfill their responsibilities.

Humanitarian Parole

Most Afghan nationals arriving as part of the evacuation effort were paroled into the United States on a case-by-case basis, for humanitarian reasons, for a period of two years. Parole is only issued subsequent to the required screening and vetting outlined above. Afghan nationals have conditions placed on their parole, including requiring them to meet certain reporting requirements and to receive medical screening and critical vaccinations. Failure to complete these requirements may cause individuals to have their work authorization (explained below) denied, and potentially to have their parole terminated, which could lead to detention and removal proceedings.

Special Immigrant Visas

Any Afghans who qualified,⁴ completed, and obtained a Special Immigrant Visa (and their dependents) were admitted to the United States as lawful permanent residents and assisted by State and non-governmental organizations to begin their resettlement process. Those individuals who did not qualify or finish the Special Immigrant Visa process were paroled into the United States by DHS and can continue to pursue special immigrant status or they may apply for a different immigration status through U.S. Citizenship and Immigration Services (USCIS).

COVID-19 Testing, Vaccinations, and Other Medical Services

All Afghan nationals who enter the United States were and are tested for COVID-19. Testing may have occurred pre-flight or upon arrival. Additionally, Afghan nationals who are paroled into the United States are required to be vaccinated for measles, mumps, and rubella

⁴ A large portion (~40%) of the Afghans who have arrived as a part of OAW were eligible for Special Immigrant Visas because they took significant risks to support U.S. military and civilian personnel in Afghanistan, employed by or on behalf of the U.S. Government in Afghanistan or coalition forces, or are a family member of someone who did.



(MMR); varicella; polio; COVID-19; and other age-appropriate vaccinations, as well as consent to medical exams and health screenings as a condition of their parole.

Processing at U.S. Military Facilities and USCIS Support

After individuals finished processing at a port of entry, they were provided transportation to safe havens where they received full medical screenings and a variety of services before moving on to their next destination. While at these safe havens, Afghan nationals have access to a range of services, including medical care and mental health services. During this step in the process, they are able to apply for work authorization with USCIS personnel and are connected to resettlement services. USCIS personnel adjudicate applications for employment authorization, conduct other immigration processing, and provide administrative support, including translation services, to expedite the processing of applications for immigrant status and work authorization. State and HHS' Office of Refugee Resettlement (ORR) work to provide initial relocation support to Afghans granted parole and to ensure that those Afghans arriving in American communities have initial support.

Resettlement Processing

Arriving Afghans are connected to Resettlement Agencies and community partners for initial resettlement assistance. Through the Afghan Placement and Assistance Program (APA), individuals are placed in communities across the country. Resettlement placement of individuals considers U.S.-based family and friends, housing availability, community capacity, and the needs and characteristics of each case. State leads this effort in close coordination with more than 200 local resettlement affiliates around the country. The local affiliates conduct extensive engagement with local communities to develop resources and support. During the resettlement process, Afghan nationals are provided with briefings on the conditions of their parole that include information on U.S. laws and their rights with respect to immigration status.

DHS Management of Parolee Cases and Information (“Phase 2”)

As part of assuming leadership of OAW, DHS is migrating the Hummingbird application from the State environment to the DHS ServiceNow environment. This migration is also occurring as the overall OAW effort transitions to Phase 2. Phase 2 involves the processing of fewer Afghan nationals and a transition to a single non-DOD safe haven.⁵ Additionally, some Phase 1 processing steps, such as medical evaluations, will now be handled prior to individuals arriving at ports of entry. But the overall goal of assisting and resettling Afghan nationals remains.

⁵ For more information on the transition from DoD safe havens to a single non-DoD domestic facility, *see* <https://www.dhs.gov/news/2022/02/19/operation-allies-welcome-announces-departure-all-afghan-nationals-us-military-bases>.

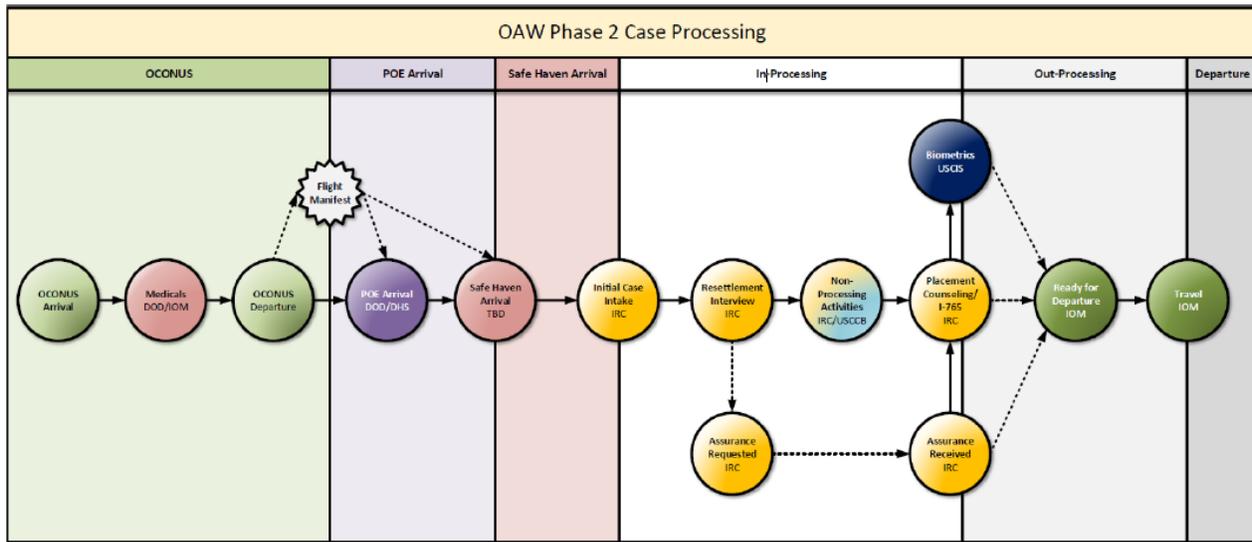


Figure 1: OAW Phase 2 Case Processing Steps

The Department’s use of Hummingbird will support all the OAW processes for Phase 2, including four key functions: Data Collection, Activity Tracking, Data Sharing, and Reporting. Data collection primarily consists of obtaining the biographical and general case information from source systems, collecting data from Afghan nationals at the safe havens, and then entering it into Hummingbird. Activity tracking is used to track an individual’s case progress through the required processing steps at a safe haven. The data collected and tracked in Hummingbird is then shared with partners, such as Resettlement Agencies and the International Organization for Migration (IOM), to facilitate onward travel and resettlement. Lastly, the data entered into Hummingbird is used to produce reports that help facilitate case processing and keep agencies and organizations informed of the overall situation at safe havens.

Hummingbird employs various cloud-based services (e.g., ServiceNow and Okta for cloud security, access, and content delivery) to effectively and efficiently manage and track necessary information to complete OAW processing and resettlement activities. The application is hosted in a Federal Risk and Authorization Management Program (FedRAMP)-certified cloud which provides accessibility and functionality restrictions to define specific user roles through its ServiceNow infrastructure. Each user role has specific limited access authority set by the DHS Office of the Chief Information Officer (OCIO) master administrators to enter and edit data. In Hummingbird, authorized users—based on their assigned role—can view case information and data, update and track completion of various processing activities at the safe haven, and search and filter the data to produce reports.

Hummingbird Information Life Cycle

During Phase 2, medical evaluations will be conducted overseas. Individuals are



considered to have completed their medical requirements prior to arrival at the safe haven. In order to complete medical screenings overseas, individuals are issued an A-Number for tracking purposes. Biographic information is sent from the overseas location to USCIS, which creates a record in the Central Index System (CIS2) and issues an A-Number to the individual. The Central Index System is a repository of electronic data that contains an index of basic data elements related to an individual passing through the immigration process.⁶ Prior to departure to the United States, pre-arrival and flight manifest data is shared with CBP in accordance with normal processes.⁷ Individuals then depart for the United States. Once an Afghan national reaches a port of entry, CBP creates a record of that individual through its normal entry and admission processes.⁸ Biographic information already collected by CBP is sent to the Central Index System for verification. Using USCIS's Person Centric Identity Services (PCIS) infrastructure, data is passed from the Central Index System through an application programming interface (API) to Hummingbird, creating the individual's Person Record. Person Centric Identity Services further updates records in Hummingbird when key adjudication data becomes available in USCIS systems. This allows Hummingbird end users to properly track the OAW population through the biometrics collection and employment authorization application process (e.g., I-765). Person Data is also transmitted to USCIS' Electronic Immigration System (ELIS)⁹ in order to pre-populate data into a USCIS Form I-765, *Application for Employment Authorization*. Additionally, data is shared from the USCIS Electronic Immigration System to Hummingbird. The USCIS Electronic Immigration System not only receives data from CBP TECS, but also receives immigrant visa data from the State Consolidated Consular Database (CCD).¹⁰ All of this data enables Hummingbird end users to have a Person Record for individuals arriving at the safe havens.

⁶ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE CENTRAL INDEX SYSTEM, DHS/USCIS/PIA-009 (2007 and subsequent updates), available at <https://www.dhs.gov/uscis-pias-and-sorns>.

⁷ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CUSTOMS AND BORDER PROTECTION, PRIVACY IMPACT ASSESSMENT FOR THE ADVANCE PASSENGER INFORMATION SYSTEM, DHS/CBP/PIA-001 (2005 and subsequent updates), available at <https://www.dhs.gov/privacy-documents-us-customs-and-border-protection>.

⁸ For more information on CBP's entry and admission processes, please see U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CUSTOMS AND BORDER PROTECTION, PRIVACY IMPACT ASSESSMENT FOR TECS, DHS/CBP/PIA-009 (2010 and subsequent updates), and U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CUSTOMS AND BORDER PROTECTION, PRIVACY IMPACT ASSESSMENT FOR ARRIVAL AND DEPARTURE INFORMATION SYSTEM, DHS/CBP/PIA-024 (2007 and subsequent updates), available at <https://www.dhs.gov/privacy-documents-us-customs-and-border-protection>.

⁹ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE ELECTRONIC IMMIGRATION SYSTEM, DHS/USCIS/PIA-056 (2016 and subsequent updates), available at <https://www.dhs.gov/uscis-pias-and-sorns>.

¹⁰ See U.S. DEPARTMENT OF STATE, PRIVACY IMPACT ASSESSMENT FOR THE CONSOLIDATED CONSULAR DATABASE (2018), available at <https://www.state.gov/wp-content/uploads/2019/05/Consular-Consolidated-Database-CCD.pdf>.



Upon arrival at the safe haven, the individual goes through an intake process conducted by one of the non-profit organizations (i.e., International Rescue Committee (IRC)),¹¹ who create a Case Record matching the intake to the individual's Person Record already populated in Hummingbird, as well as associating other family members moving through the process. If the safe haven field operators cannot locate an individual's Person Record in Hummingbird, they work with USCIS to retrieve it and reconcile the data. During the intake process, field operators verbally confirm imported biographical data and collect other relevant resettlement and immigration information directly from the individual. Field operators also gather information on known family or friends in the United States that the individual would like to resettle nearby. Field operators use the CBP One mobile application¹² to take a photo of the individual and match it to the photo taken at the port of entry, along with the biographic information of the individual to the correct Person Data (e.g., A-Number, name).

As field operators review the individual's case, they track completion of processing tasks (i.e., Activity Records), such as work authorization activities, immigration tasks, and resettlement activities. Activity Records are used to track a case's progress through all the required steps that must be completed at the safe haven for successful resettlement. Activity Records include post-arrival tasks used to track the steps cases must complete at each processing location based on what is needed for each individual's case as determined during the intake process.

After the initial intake process, field operators conduct a resettlement interview where they ask individuals if they would like to resettle close to family members or friends in the United States and provide additional information about resettlement.¹³

Resettlement Agencies have access to Hummingbird so they can select individuals to be resettled with their agency's area of responsibility and view limited information about the cases assigned to their agency for the purposes of resettlement. Prior to departing a safe haven, cases are put through an assurance process¹⁴ wherein a Resettlement Agency and its affiliate(s) commit to

¹¹ DHS uses the term *field operators* to designate Hummingbird end users at safe havens. Field operators can include personnel from DHS, other federal agencies, or non-government organizations. Assisting DHS personnel are not acting under the authorities of their home agency, but rather the authorities of OAW. For example, a USCG service member or USSS employee working at a safe haven is not collecting data to input into any of their home agency databases; they are simply there to assist with the processing and resettlement efforts that DHS is charged with. However, USCIS does have a specific role under their own authorities that it does fulfill at the safe haven. This is further outlined below.

¹² See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CUSTOMS AND BORDER PROTECTION, PRIVACY IMPACT ASSESSMENT FOR THE CBP ONE™ MOBILE APPLICATION, DHS/CBP/PIA-068, available at <https://www.dhs.gov/privacy-documents-us-customs-and-border-protection>.

¹³ In addition to the resettlement counseling, these agencies may also facilitate non-processing related activities including cultural orientation and safety and risk prevention classes. These activities are not tracked in Hummingbird and their completion does not impact an individual's resettlement timeline.

¹⁴ Assurance is the process by which Resettlement Agencies and their local affiliates commit to providing initial reception and placement services to a case comprised of an individual or family.



providing initial reception and placement services. Cases will begin the assurance process in Hummingbird after completing the resettlement interview. As part of the assurance process, Resettlement Agencies will reach out to the family or friends the Afghan national listed as a preference to resettle nearby to confirm their ability to provide support. Once a case is assured, the field operators will provide placement counseling, which is used to notify individuals of their final destination for resettlement and provide any additional required or necessary counseling.

Following placement counseling, field operators will assist individuals in completing USCIS Form I-765, *Application for Employment Authorization*. Once the I-765 is completed, it is submitted to USCIS at the time the individual attends their USCIS biometric appointment. At the biometric appointment, USCIS electronically captures the individual's fingerprints and biographic information that is required to verify the individual's identity and ensure that the correct biographic information is associated with the captured biometrics. This data is associated together and stored in the USCIS Customer Profile Management System (CPMS), which is the centralized source of biometric images used for USCIS benefit card and document production.¹⁵ The individual is provided with a copy of their I-765 receipt notice that informs them that a record has been created in USCIS case management systems containing their personal information.

Once all of these processes have been completed, the case moves to the International Organization for Migration workflow. The International Organization for Migration is responsible for travel arrangements for individuals leaving the safe havens. Before conducting any travel arrangements, the International Organization for Migration is responsible for ensuring that all cases have completed the necessary requirements based on the Activity Records in Hummingbird. The International Organization for Migration sends a report of data related to travel bookings back to Hummingbird. In order to facilitate the responsibilities of OAW, a number of organizations, including those already listed above, require access to at least some of the data maintained in Hummingbird. The agencies listed below have direct access to Hummingbird.

DHS Partners:

- U.S. Citizenship and Immigration Services (USCIS)

Federal Partners:

- Department of State (State)
- Department of Health and Human Services (HHS)

¹⁵ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE CUSTOMER PROFILE MANAGEMENT SERVICE, DHS/USCIS/PIA-060 (2015 and subsequent updates), available at <https://www.dhs.gov/uscis-pias-and-sorns>.



Non-Government Organizations and Private Sector:

- International Organization for Migration (IOM)
- Church World Service (CWS)
- World Relief (WR)
- International Rescue Committee (IRC)
- HIAS (formerly Hebrew Immigrant Aid Society)
- United States Conference of Catholic Bishops (USCCB)
- Ethiopian Community Development Council (ECDC)
- Episcopal Migration Ministries (DFMS/EMM)
- U.S. Committee for Refugees and Immigrants (USCRI)
- Lutheran Immigration and Refugee Services (LIRS)
- Community Sponsorship Hub
- State Afghan Placement and Assistance (SAPA)

Access for these agencies and organizations to Hummingbird is managed by role-based access controls. First, an individual has to be provisioned User Access to ServiceNow. Then, before accessing any Hummingbird data, the individual is assigned a “Group.” DHS uses Groups developed for specific job functions to provision appropriate access. Users are assigned to a Group based on the access they require to complete their assigned tasks and responsibilities. Once they are admitted to a Group, they are afforded the different roles (e.g., Read, Write, Admin) the Group is assigned. One agency/organization may have individuals across different Groups or confined within one Group.

Group	Access Provisions
Hummingbird Admin	Members of this Group have the highest level of access and is restricted to those personnel with training/knowledge of the data model and process for Hummingbird.
Hummingbird Task Force	Members of this Group are the general Hummingbird users (e.g., field operators). Access is granted to manage cases, people, and activities in the Hummingbird application.



Hummingbird USCIS	USCIS personnel have access to additional data in an individual’s record and can add USCIS data to the Person Record. All users in this Group must also have Task Force access to be able to take any action.
Hummingbird Resettlement Agency	Members of this Group are tied to a specific Resettlement Agency with the ability to view selected read-only cases, assign affiliates, assure cases, or send them back for re-selection.
Hummingbird Emailers	Members of this group have access to generate and send out bulk Group communications for Hummingbird reporting purposes.
Hummingbird Bulk Import	Members of this Group have access to import case, person, and activity data into Hummingbird, if necessary. This Group is extremely limited and is needed if new data (not outlined above) would ever need to be imported.
Hummingbird Read-Only	Members of this Group will have read-only access to Hummingbird data.
Hummingbird Reporting	Members of this Group will have the ability to create, view, manage, and share reports.

Fair Information Practice Principles (FIPPs)

The Privacy Act of 1974¹⁶ articulates concepts of how the federal government should treat individuals and their information and imposes duties upon federal agencies regarding the collection, use, dissemination, and maintenance of personally identifiable information. The Homeland Security Act of 2002 Section 222(2) states that the Chief Privacy Officer shall assure that information is handled in full compliance with the fair information practices as set out in the Privacy Act of 1974.¹⁷

In response to this obligation, the DHS Privacy Office developed a set of Fair Information Practice Principles (FIPPs) from the underlying concepts of the Privacy Act to encompass the full breadth and diversity of the information and interactions of DHS.¹⁸ The Fair Information Practice

¹⁶ 5 U.S.C. § 552a.

¹⁷ 6 U.S.C. § 142(a)(2).

¹⁸ U.S. DEPARTMENT OF HOMELAND SECURITY, PRIVACY POLICY GUIDANCE MEMORANDUM 2008-01/PRIVACY POLICY DIRECTIVE 140-06, THE FAIR INFORMATION PRACTICE PRINCIPLES: FRAMEWORK FOR PRIVACY POLICY AT THE DEPARTMENT OF HOMELAND SECURITY (2008), available at <https://www.dhs.gov/privacy-policy-guidance>.



Principles account for the nature and purpose of the information being collected in relation to DHS's mission to preserve, protect, and secure the Homeland.

DHS conducts Privacy Impact Assessments on both programs and information technology systems, pursuant to the E-Government Act of 2002, Section 208¹⁹ and the Homeland Security Act of 2002, Section 222.²⁰ Given that the OAW resettlement process involves a number of different programmatic aspects rather than a particular information technology system, this Privacy Impact Assessment is conducted as it relates to DHS' implementation of the Fair Information Practice Principles.

1. Principle of Transparency

Principle: DHS should be transparent and provide notice to the individual regarding its collection, use, dissemination, and maintenance of PII. Technologies or systems using PII must be described in a SORN and PIA, as appropriate.

On August 29, 2021, the Memorandum on the Designation of the Department of Homeland Security as Lead Federal Department for Facilitating the Entry of Vulnerable Afghans into the United States directed DHS to lead implementation of ongoing efforts across the federal government to support vulnerable Afghans, including those who worked alongside the United States in Afghanistan for the past two decades, as they safely resettle in the United States. DHS maintains a webpage to specifically address OAW, available at <https://www.dhs.gov/allieswelcome>. This webpage outlines the operational phases of OAW provides fact sheets, answers Frequently Asked Questions, and delineates benefit processes.

This Privacy Impact Assessment also provides notice of this effort and the type of information collected and used as Afghan nationals move through the resettlement process. Much of the information used in Hummingbird is originally captured through other agency processes, such as those of CBP, USCIS, and State, who maintain their own transparency mechanisms and privacy compliance documentation. Any information collected by a federal agency and input into Hummingbird is bound by the requirements of the Privacy Act, which include providing Privacy Act Statements on any information collection instruments an individual may complete, as appropriate.

The associated System of Records Notices related to pre-arrival, port of entry, USCIS, and safe haven activities provide additional notice. System of Records Notices that cover the collection of data from Afghan nationals throughout the entire OAW process and input into Hummingbird include:

¹⁹ 44 U.S.C. § 3501 note.

²⁰ 6 U.S.C. § 142.



- DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Record;²¹
- DHS/USCIS-007 Benefits Information System;²²
- DHS/USCIS-010 Asylum Information and Pre-Screening System of Records;²³
- DHS/USCIS-017 Refugee Case Processing and Security Screening Information System;²⁴
- DHS/USCIS-018 Immigration Biometric and Background Check System of Records;²⁵
- DHS/CBP-005 Advance Passenger Information System (APIS);²⁶
- DHS/CBP-007 CBP Border Crossing Information;²⁷
- DHS/CBP-011 U.S. Customs and Border Protection TECS;²⁸
- DHS/CBP-021 Arrival and Departure Information System (ADIS);²⁹ and
- Visa Records, State-39.³⁰

Privacy Risk: There is a risk that individuals do not know that information they have previously provided to CBP and USCIS and the new information they are providing through the resettlement process are input into Hummingbird to complete the resettlement process.

Mitigation: This risk is mitigated. Hummingbird largely relies on data collected through established USCIS and CBP processes. These processes have their own privacy notice mechanisms and privacy compliance documentation, to include their own public-facing Privacy Impact Assessments and System of Records Notices. In providing notice, these privacy compliance

²¹ See DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 82 Fed. Reg. 43556 (September 18, 2017), available at <https://www.dhs.gov/system-records-notices-sorns>.

²² See DHS/USCIS-007 Benefits Information System, 84 Fed. Reg. 54622 (October 10, 2019), available at <https://www.dhs.gov/system-records-notices-sorns>.

²³ See DHS/USCIS-010 Asylum Information and Pre-Screening System of Records, 80 Fed. Reg. 74781 (November 30, 2015), available at <https://www.dhs.gov/system-records-notices-sorns>.

²⁴ See DHS/USCIS-017 Refugee Case Processing and Security Screening Information System of Records, 81 Fed. Reg. 72075 (October 19, 2016), available at <https://www.dhs.gov/system-records-notices-sorns>.

²⁵ See DHS/USCIS-018 Immigration Biometric and Background Check (IBBC) System of Records, 83 Fed. Reg. 36950 (July 31, 2018), available at <https://www.dhs.gov/system-records-notices-sorns>.

²⁶ See DHS/CBP-005 Advance Passenger Information System (APIS), 80 Fed. Reg. 13407 (March 13, 2015), available at <https://www.dhs.gov/system-records-notices-sorns>.

²⁷ See DHS/CBP-007 Border Crossing Information (BCI), 81 Fed. Reg. 89957 (December 13, 2016), available at <https://www.dhs.gov/system-records-notices-sorns>.

²⁸ See DHS/CBP-011 U.S. Customs and Border Protection TECS, 73 Fed. Reg. 77778 (December 19, 2008), available at <https://www.dhs.gov/system-records-notices-sorns>.

²⁹ See DHS/CBP-021 Arrival and Departure Information System (ADIS), 80 Fed. Reg. 72081 (November 18, 2015), available at <https://www.dhs.gov/system-records-notices-sorns>.

³⁰ See Visa Records, State-39, 86 Fed. Reg. 61822 (November 8, 2021), available at <https://www.federalregister.gov/documents/2021/11/08/2021-24303/privacy-act-of-1974-system-of-records>.



documents inform readers that the information they provide will be used to obtain a benefit from the U.S. Government, even if not specifically OAW resettlement. This Privacy Impact Assessment serves as an additional measure of notice, as does the information on the DHS Operation Allies Welcome webpage explaining the screening, vetting, and resettlement processes.

When new information is collected directly from Afghan nationals at safe havens, they are notified that information is being collected as part of the OAW process, which involves DHS. While they are not informed specifically that the information is being put into Hummingbird, they are aware that the U.S. Government and non-government organizations are collecting their information for purposes of the resettlement process.

With the transition from State, DHS is continuing to ensure that appropriate notice is provided at every step of the OAW process. The Hummingbird Program is working with the DHS Privacy Office to identify any other areas where notice or Privacy Act Statements could be provided to increase transparency.

Privacy Risk: There is a risk that individuals who are points of contact for Afghan nationals going through the resettlement process may not know that their information is being submitted by the Afghan nationals, collected by DHS, and input into Hummingbird.

Mitigation: This risk is partially mitigated. Although notice of the submission is largely incumbent on the individual Afghan national, this Privacy Impact Assessment and other public-facing information on OAW and the resettlement process provide information on how those individuals and their data may be involved. In the event that an individual's contact information is provided during the OAW process for resettlement and input into Hummingbird, that individual would likely be contacted by a Resettlement Agency during the assurance process to coordinate the Afghan national's placement.

2. Principle of Individual Participation

Principle: The Department should involve the individual in the process of using personally identifiable information. The Department should, to the extent practical, seek individual consent for the collection, use, dissemination, and maintenance of personally identifiable information and should provide mechanisms for appropriate access, correction, and redress regarding the Department's use of personally identifiable information.

Resettling Afghan nationals through OAW is a multi-step process that requires data collection and sharing throughout. During the intake interview at the safe haven, personally identifiable information that has been ingested into Hummingbird is confirmed by field operators with the individual. If information is incorrect or missing, the individual works with the field operator to address and reconcile any shortcomings. Afghan nationals do not directly consent to their information being input into Hummingbird to facilitate the resettlement process. However, they do consent to the collection of their information by CBP and USCIS through the processes



previously explained and upon any additional necessary collections during the intake and interview processes at the safe havens.

In addition, any individual seeking access to or amendment of their records may submit a request in writing to the Department of Homeland Security Chief Privacy and Freedom of Information Act (FOIA) Officer at the address below, or to the respective Component's Freedom of Information Act Officer, which can be found at <https://www.dhs.gov/foia-contact-information>. DHS also accepts Privacy Act and Freedom of Information Act requests submitted electronically at <https://www.dhs.gov/dhs-foia-privacy-act-request-submission-form>.

Chief Privacy Officer and Chief Freedom of Information Act Officer
Privacy Office
Department of Homeland Security
2707 Martin Luther King Jr. Avenue SE
Washington, D.C. 20528

Furthermore, travelers who wish to file for redress can complete an online application through the DHS Traveler Redress Inquiry Program (DHS TRIP) at <https://trip.dhs.gov>, or mail or email a completed copy of DHS Form 591, Travel Inquiry Form (TIF). For more information about the types of services the Department of Homeland Security Traveler Redress Inquiry Program can provide, please visit <https://www.dhs.gov/step-1-should-i-use-dhs-trip>.

Privacy Risk: There is a risk that individuals may not have appropriate access to redress should any information be inaccurate given the number of different sources from which Hummingbird pulls data.

Mitigation: This risk is mitigated. OAW was established as a multi-agency and multi-organization effort to assist individuals fleeing the humanitarian crisis in Afghanistan. DHS is leading numerous federal agencies, such as State and HHS, to collaborate with state and local governments, non-profit organizations, and the private sector in order to facilitate resettlement. The OAW process allows individuals an opportunity to correct any inaccurate issues requiring redress during the intake procedure at safe havens. Additionally, field operators and Resettlement Agencies are at safe havens to assist these individuals with any difficulties they may have.

Further, DHS provides redress opportunities through the Privacy Act (where appropriate), the Freedom of Information Act, and the DHS Traveler Redress Inquiry Program.

Privacy Risk: There is a risk that individuals may not have the opportunity to provide the appropriate consent for data being input into Hummingbird.

Mitigation: This risk is mitigated. Information collected by CBP and USCIS and shared with Hummingbird is confirmed directly with the individual upon the intake and interview



processes at the safe havens. Any additional information required for the resettlement process upon arrival to the safe haven is collected directly from the individual.

With the transition from State, DHS is continuing to ensure that appropriate consent is received at every step of the OAW process. The Hummingbird Program is working with the DHS Privacy Office to identify any areas where consent is legally required or should be implemented as a best practice.

3. Principle of Purpose Specification

Principle: DHS should specifically articulate the authority which permits the collection of PII and specifically articulate the purpose or purposes for which the PII is intended to be used.

As OAW transitions from the immediate relocation efforts toward resettlement under immigration laws, the Department operates this program under the Secretary's broad immigration authorities: Section 402 of the Homeland Security Act of 2002, as revised (Pub. L. 107-296) (6 U.S.C. § 202).

The purpose of Hummingbird is to provide centralized and standardized tracking and reporting for OAW, including resettlement progress. Hummingbird allows DHS to track individuals through applicable stages of case processing at safe havens, view case information and applicant biographic data, update records, track completion of various processing activities, and use the searching and filtering capabilities to produce reports. All information in the Hummingbird application will be used by DHS and other federal agency personnel and Resettlement Agencies to determine an applicant's eligibility through OAW, and to assist with processing immigration benefits, and resettlement of those individuals.

4. Principle of Data Minimization

Principle: DHS should only collect PII that is directly relevant and necessary to accomplish the specified purpose(s) and only retain PII for as long as is necessary to fulfill the specified purpose(s). PII should be disposed of in accordance with DHS records disposition schedules as approved by the National Archives and Records Administration (NARA).

DHS is taking over operation of the Hummingbird application from State. During Hummingbird's initial development stages of OAW State determined the information about individuals necessary to carry out the resettlement process. Each data element collected is needed by a federal agency or Resettlement Agency to fulfill their responsibilities. Hummingbird largely consists of three types of records:

- Person Records – include largely biographic data about the individual;
- Case Records – include overarching case processing and assurance information, as well as family unit processing information; and



- Activity Records – include information used to track the progress of each activity or processing step for an individual’s case (e.g., pre- and post-arrival requirements).

Person Records – this information may be populated in Hummingbird through the connection to USCIS systems or during the intake and interview processes at safe havens.

- Name
- Person Type (indicates if the applicant is the *Principal* or a *Derivative* of the principal)
- Relationship to Principal (if not principle)
- A-Number
- Afghan National ID (i.e., Tazkera)
- Alias
- Date of Birth
- Place of Birth
- Country of Citizenship
- Language
- Gender
- Previous Address
- Contact Information (e.g., mail, phone)
- Results of Security Screening (if available)
- USCIS ELIS Account Number
- Port of Entry Used
- Passport Details
- Visa Status (indicates Special Immigrant Visa applicants; this field can be left blank for non- Special Immigrant Visa applicants)
- Visa Number
- Visa Class
- Badge Number (if badges are used at safe haven)
- Self-Reported Medical Information
- Pregnancy Information



- Insurance Information (e.g., Medicaid, Marketplace)
- Dates, Adjudication Status, and Other Relevant Information for the following DHS Forms:
 - USCIS Form I-485, Application to Register Permanent Residence or Adjust Status
 - USCIS Form I-693, Report of Medical Examination and Vaccination Record
 - USCIS Form I-765, Application for Employment Authorization
 - CBP Form I-94, Arrival/Departure Record

Case Records:

- Hummingbird Case Number (Hummingbird assigns a unique case number (HB-000000) to all cases)
- IVIS Case Number (Special Immigrant Visa's Immigrant Visa Information System number, if applicable)
- USCIS Form I-360, Petition for Amerasian, Widow(er), or Special Immigrant, Receipt Number
- Phase (auto-updates based on the completion of activities in the Activity Records)
- Processing Location and Dates (i.e., safe haven)
- Processing Delay (used to indicate if a case is experiencing a delay in processing)
- English Interpretation Required (Yes/No)
- Results of Security Screening
- Vulnerability (used to indicate instances where a case has particular protection, medical, or other vulnerability concerns that may affect processing)
- MMR Vaccination Dates
- Self-Reported Medical Condition
- Resettlement Preference
- Final Destination Airport Code
- Resettlement Agency
- Affiliate (when the Resettlement Agency has assigned the case to one of its Affiliates)
- Assurance Requested (Yes/No)



- Assurance Received (Yes/No)
- Attached Minor on Case
- View Related Cases (used to link cases in system, for example between family units)
- U.S. Point of Contact Information (e.g., name, address, contact information, relationships to individual)

Activity Records:

- Hummingbird Case Number
- Intake Date and Location
- Processing Date and Location
- Pre-Flight Medicals Completed (Yes/No)
- Lodging Assignment
- Self-Reported Medicals
- Vaccinations
- COVID-19 Testing
- Work Authorization
- Biometric Appointment
- Out-Processing Information
- Departure and Travel Information

Privacy Risk: There is a risk that Hummingbird will maintain information it receives and uses for longer than necessary.

Mitigation: This risk is not mitigated. DHS is still working to understand the different ownership and retention requirements related to the different data that is maintained in Hummingbird. DHS will likely be required to ensure that the data is maintained in accordance with existing agency records schedules. However, until a retention plan is approved, the records will be maintained as permanent. Once the records retention schedule is approved, the Hummingbird Team and the administrators of the ServiceNow platform will ensure that the retention requirements are followed. This may require additional technical development capabilities, such as data tagging.

Privacy Risk: There is a risk that Hummingbird collects more information than necessary.



Mitigation: This risk is partially mitigated. Due to the transition of Hummingbird from State to DHS, the application is maintaining the process framework and data collection it has used since Hummingbird was initially launched to support Operation Allies Refuge and then OAW. All of these data elements have proven to be necessary for the federal agencies and Resettlement Agencies involved in the OAW process.

However, with this transition, DHS is continuing to ensure that appropriate data minimization practices are adhered to. The Hummingbird Program is working with the DHS Privacy Office to identify any areas where there may be unnecessary data collection or duplications.

5. Principle of Use Limitation

Principle: DHS should use PII solely for the purpose(s) specified in the notice. Sharing PII outside the Department should be for a purpose compatible with the purpose for which the PII was collected.

Information collected, used, and maintained in the Hummingbird application is only used for purposes of resettling Afghan parolees through the OAW efforts. These purposes are outlined in this Privacy Impact Assessment and the public-facing OAW materials on the DHS website. This information is shared with those individuals working on the OAW program who have a need-to-know from federal agencies, such as DHS and State, and Resettlement Agencies.

Privacy Risk: There is a risk information collected for the purposes of Afghan resettlement and maintained in Hummingbird may be used inappropriately.

Mitigation: This risk is partially mitigated. This Privacy Impact Assessment and other public-facing information about OAW document the types of the information being collected and the purposes for which it will be used. Only those federal agency personnel and partner Resettlement Agencies with a need-to-know will have access to this information. The ServiceNow platform functionality allows for role-based access controls so that information can be partitioned as required. For example, members of the Hummingbird Resettlement Agency group have the ability to view selected read-only cases, assign affiliates, assure cases, or send them back for re-selection.

Additionally, the Terms and Conditions that Hummingbird end users must accept when accessing the system outline the appropriate purposes for which they can access the ServiceNow platform and use the data, under civil or criminal penalty.

Lastly, DHS has developed a Hummingbird Processing Guide for end users and field operators to ensure proper usage.

6. Principle of Data Quality and Integrity

Principle: DHS should, to the extent practical, ensure that PII is accurate, relevant, timely, and complete, within the context of each use of the PII.



The Hummingbird application supports OAW safe haven processing and resettlement activities for Afghan parolees. All information collected is required to complete the resettlement process. In Hummingbird, authorized users based on their assigned role can view case information and applicant biographic data, update and track completion of various processing activities at the safe haven, and use searching and filtering capabilities to produce reports.

Collection of data begins before an individual departs for the United States through normal CBP processes, continues with the arrival of the individual at a port of entry and at the safe haven, and concludes with the departure and resettlement of the individual. Multiple source systems populate data within Hummingbird to support safe haven processing. During the intake process, the field operator reviews the data provided from those source systems to ensure accuracy. The individual may provide additional information to further populate a Person Record and Case Record during the intake and interview processes. When an update to a Person Record is made in Hummingbird, service connections ensure that all applicable record and case systems (e.g., Person Centric Identity Services, Central Index System, Electronic Immigration System) receive the same updates. An interpreter may be provided if required. Safe haven processing activities are recorded as Activity Records when completed. Should field operators find that information is missing while completing safe haven processing, they can reach back to the individual for required details.

Privacy Risk: There is a risk that inaccurate information could be used during the safe haven processing and resettlement processes that could impact an individual's ability to receive resettlement assistance.

Mitigation: This risk is mitigated. Field operators validate personally identifiable information directly with the individual during the intake and interview process. Should a field operator find information is missing, they can meet with the individual at the safe haven to get the required information. Receiving information automatically from the source systems (e.g., USCIS' Central Index System) helps ensure accuracy of data, rather than requiring significant amounts of manual data entry.

With the transition of Hummingbird from State, DHS is continuing to ensure that appropriate data quality measures are implemented at every step of the OAW process. The Hummingbird Program is working with the DHS Privacy Office to identify any areas where additional efforts can be taken to increase data quality.

Privacy Risk: There is a risk that Afghan nationals may not have access to certain information or documents because the circumstances of departure or lack of precision in record keeping.

Mitigation: This risk is partially mitigated. Because some Afghan nationals will arrive without necessary documents, some individuals have to rely on what they can remember. There may be little or no opportunity to compare U.S. Government records with Afghan records.



However, DHS is using a process that allows for both reconciliation against existing U.S. Government records, when available, and direct collection from the individual. The intake and interview process allow for additional reconciliation to take place directly with the individual.

7. Principle of Security

Principle: DHS should protect PII (in all forms) through appropriate security safeguards against risks such as loss, unauthorized access or use, destruction, modification, or unintended or inappropriate disclosure.

All of the systems and technology DHS uses as part of this effort have been accredited in accordance with the requirements of DHS 4300A, Sensitive Systems Policy Directive.³¹ DHS implements appropriate administrative and technical safeguards, such as privileged or administrator accounts that restrict access to authorized personnel with a valid need-to-know to perform official duties and responsibilities. The Hummingbird application is made available only to those individuals with a need-to-know. System administrators set user roles to ensure appropriate access and use.

After using a PIV card to access a government device, any DHS employee that needs access to Hummingbird will be required to use Multi-Factor Authentication. This is accomplished by the use of a unique username and strong password, along with a security PIN provided by an authenticator application from their mobile device. Non-governmental users will also be required to use Multi-Factor Authentication to access the system.

DHS conducts regular audits of Hummingbird users and maintains audit logs of activity in the system in accordance with DHS 4300A. These logs provide information on which files have been accessed, the date/time they were accessed, who accessed them, and whether any records were updated or modified.

Privacy Risk: There is a risk that individuals who have not been provisioned an account will gain access to Hummingbird data because the system is open to non-federal agency individuals (i.e., non-government organizations).

Mitigation: This risk is mitigated. The systems and processes that the Hummingbird application uses ensure that only those with a need-to-know will have access to the data. DHS personnel must be provisioned specific access to ServiceNow and the Hummingbird application within. Access is only gained through username/password and Multi-Factor Authentication. Once in the application, users are provisioned role-based access based on their group role. Users are bucketed into the following groups:

- Hummingbird Administrator

³¹ See U.S. DEPARTMENT OF HOMELAND SECURITY, DHS SENSITIVE SYSTEMS POLICY DIRECTIVE 4300A (2017), available at <https://www.dhs.gov/privacy-policy-guidance>.



- Hummingbird Task Force
- Hummingbird USCIS
- Hummingbird Resettlement Agency
- Hummingbird Emailers
- Hummingbird Bulk Import
- Hummingbird Read-Only
- Hummingbird Reporting

Privacy Risk: There is a risk that the equipment used does not meet security requirements because it is not U.S. Government equipment.

Mitigation: This risk is partially mitigated. Access to Hummingbird does not require DHS-issued equipment. DHS does not review or scan the equipment Resettlement Agencies, for example, use to conduct their Hummingbird activities. However, Hummingbird is only accessed through Multi-Factor Authentication. U.S. Government users only have access to Hummingbird after using a PIV card to access a government device, a unique username and strong password, and a security PIN provided by an authenticator application from their mobile device (i.e., Okta). Non-governmental users will also be required to use this Multi-Factor Authentication method to access the system.

DHS conducts regular audits of Hummingbird users and maintains audit logs of activity in the system in accordance with DHS 4300A. These logs provide information on which files have been accessed, the date/time they were accessed, who accessed them, and whether any records were updated or modified.

8. Principle of Accountability and Auditing

Principle: DHS should be accountable for complying with these principles, providing training to all employees and contractors who use PII, and should audit the actual use of PII to demonstrate compliance with these principles and all applicable privacy protection requirements.

Hummingbird users must accept a Terms and Conditions notice each time they log in to the application reminding them that unauthorized or improper use or access may result in administrative action, as well as civil and criminal penalties. The ServiceNow platform that hosts Hummingbird implements technical safeguards (e.g., role-based access controls) that ensure only authorized users with a valid need-to-know have access to the information to accomplish their assigned tasks and responsibilities. The Hummingbird application accessibility and functionality restrictions are defined by user roles. Each user role has defined and limited access authority to view and edit data set by a master administrator. The user roles are determined on a need-to-know basis to perform official duties. The master administrators also monitor all account and user



activity to the information system. The master administrators use automated tools to assist them in monitoring, analyzing, and reporting activities in the system. The ServiceNow platform also allows for the creation of audit logs to show all actions taken in the system by individual users and with individual cases.

Due to the transition of the Hummingbird application from State, DHS is continuing to ensure that it is taking all necessary accountability and auditing measures. The Hummingbird Team meets weekly with the DHS Privacy Office to ensure that this Privacy Impact Assessment is being adhered to and best practices continue to be implemented.

Approval Signature

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

Lynn Parker Dupree
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