



# Privacy Impact Assessment

for the

# Revenue Modernization Program

**DHS Reference No. DHS/CBP/PIA-078**

**April 12, 2023**



**Homeland  
Security**



## Abstract

The U.S. Customs and Border Protection (CBP) Office of Finance (OF) Revenue Modernization Program is a multi-year, phased revenue collections capability benefitting the public and CBP Office of Field Operations (OFO), Customs Officers at the Ports of Entry (POE), by allowing for improved electronic and online payment options. Revenue Modernization allows CBP to create and maintain electronic records for the collection of non-cargo<sup>1</sup> related duties, taxes, and fees. CBP is publishing this Privacy Impact Assessment (PIA) because CBP has multiple information technology systems within the Revenue Modernization Program that collect, maintain, and use personally identifiable information (PII) for the collection of duties, taxes, and fees.

## Overview

The United States has long relied on revenue from imported goods – the payment of duties, taxes, or other charges assessed and collected by CBP on merchandise brought into the United States – to fund the Federal Government. Revenues collected from customs duties date to the inception of the United States of America. The second Act of the First Congress of the United States on July 4, 1789, established a system of tariffs on imported “goods and merchandises” to fund the new federal government. Today, U.S. Customs and Border Protection is the second largest revenue-collecting agency in the Federal Government. In Fiscal Year (FY) 2021, CBP collected approximately \$98.8 billion in duties, taxes, and other fees.

The revenue collection process is one of CBP’s most important and oldest functions and was recently re-designated a Priority Trade Issue (PTI) per the Trade Facilitation and Trade Enforcement Act of 2015 (TFTEA).<sup>2</sup> Priority Trade Issues are high-risk trade areas that can cause significant harm to the U.S. economy through revenue loss, or which threaten the health and safety of the American people. The Revenue Priority Trade Issue requires CBP to focus resources on enforcing trade laws, facilitating legitimate trade, and collecting lawfully owed duties and fees.<sup>3</sup>

CBP thoroughly scrutinizes revenue collection because of illicit attempts to evade duties and fees, which defraud the U.S. government and undermine lawful business. CBP’s role as the second largest revenue collector for the U.S. government exemplifies the significance of Revenue identified as a Priority Trade Issue. The Revenue Priority Trade Issue supports CBP’s mission by:

---

<sup>1</sup> CBP uses the term “non-cargo” to refer to collections that are not import related and are not already identified in the formal entry processes managed by the Office of Trade (OT) in the Automated Commercial Environment (ACE). It is estimated that nearly 90% of the transactions related to collections are for the import of goods and are processed through the Automated Commercial Environment, whereas 10% of CBP’s collection volume must be processed at the ports of entry which include intensive manual activities to support the high-volume of receipt and record keeping for cash and checks.

<sup>2</sup> 19 U.S.C. § 4322(a)(5) (2016).

<sup>3</sup> See CBP Publication #0597-0117 Priority Trade Issue – Revenue, *available at* [https://www.cbp.gov/sites/default/files/assets/documents/2017-Jan/FY 2016 PTI Brochure Revenue 1.pdf](https://www.cbp.gov/sites/default/files/assets/documents/2017-Jan/FY%2016%20PTI%20Brochure%20Revenue%201.pdf).



- Facilitating the swift movement of legitimate trade by enabling fair and lawful trade and travel, and segmenting risk;
- Improving the United States' economic competitiveness by enforcing trade laws while regulating and ensuring proper revenue collection;
- Pursuing revenue collection through a risk-based approach to identify and address violators and their circumvention schemes; and
- Promoting mechanisms, both traditional and innovative, to address revenue risks, while also improving trade intelligence and collaboration with government and industry partners.

Revenue collection is considered a high-risk trade issue in large part because some importers make illicit attempts to evade payment of duties and fees, circumvent legitimate trade practices, defraud the U.S. government, and undermine lawful business. To operationalize the Revenue Priority Trade Issue, CBP developed an enterprise-wide revenue modernization program (“Rev Mod Solutions”) to modernize CBP collections and mitigate the risks and inefficiencies that CBP previously experienced regarding trade revenue collections. CBP is conducting this Privacy Impact Assessment to identify the privacy risks associated with this modernized revenue collections solution.

CBP identified gaps in the historical revenue collection processes, including uniformed and non-uniformed personnel handling time-intensive cash and check transactions across the ports of entry. As a result, resources were directed away from critical enforcement and trade facilitation duties while other limited resources (professional staff) expended significant hours reconciling and reporting on manual revenue collection activities.

Additionally, CBP’s historical revenue collection processes created unnecessary burdens on the trade and travel communities. The technical changes CBP is implementing as part of Rev Mod Solutions move CBP closer to a centralized, non-paper based, automated, and modernized revenue collections and administrative framework that enables access to real-time, reliable financial, administrative, and operational data for better informed decision-making. Rev Mod Solutions, the technology behind the Rev Mod program, leverages existing CBP technology to move manual transactions to electronic platforms while integrating revenue collection information into existing CBP financial systems.

Rev Mod Solutions replaces manual paper processes with automated fee calculations, electronic receipt creation and distribution, and electronic and online payment methods. The increased use of electronic and automated transactions also enables better access to more accurate revenue collections data at the transaction level for recordkeeping by both CBP and the public.

CBP designed Rev Mod Solutions to:



- Address non-cargo related revenue collection capability gaps and revitalize CBP's revenue processes at ports of entry;
- Reduce labor-intensive manual processes around revenue collection at the ports of entry;
- Increase online and electronic payment options for the collection of duties, taxes, and fees; and
- Capture in-scope revenue collection data at the transaction level to enable improved reporting and business analytics.

Rev Mod Solutions enhancements include the following revenue collection processes that automate the assessment and collection of duties, taxes, and fees (including vessels, vehicles, and passengers entering through U.S. ports of entry) and provide customers with electronic receipts for payments:

1. **Mobile Collections and Receipts (MCR):** A mobile and desktop application accessed by CBP Officers that replaces the CBP Form 368 Cash Receipt and 1002 Tonnage Tax Certificate<sup>4</sup> and allows CBP to accept payments in a mobile environment or in a location that does not have a cash register. Mobile Collections and Receipts includes offline capabilities; integration with the Vessel Risk List system<sup>5</sup> to provide vessel information that automates fee calculations based on vessel payment history; and delivers electronic receipts to customers. Mobile Collections and Receipts is limited to internal CBP users only; CBP Officers enter cash or check payments into Mobile Collections and Receipts to produce a receipt.
2. **Electronic Payment Options (ePO) and the eCBP Portal:** The public-facing eCBP

---

<sup>4</sup> Pursuant to Title 19 Code of Federal Regulations (CFR) CFR § 4.23:

Upon each payment of the tonnage tax or light money, the master of the vessel shall be given a certificate on Customs Form 1002 on which the control number of the cash receipt (Customs Form 368 or 368A) upon which payment was recorded shall be written. This certificate shall constitute the official evidence of such payment and shall be presented upon each entry during the tonnage year to establish the date of commencement of the tonnage year and to insure against overpayment. In the absence of the certificate, evidence of payment of tonnage tax shall be obtained from the port director to whom the payment was made.

(Payment for tonnage tax references taxes payable for maritime conveyances and is currently limited only to such conveyances).

<sup>5</sup> Mobile Collections and Receipts connects to the Vessel Management System (VMS) (specifically, its function, the Vessel Risk List) within the Automated Targeting System (ATS) and pulls various parameters (e.g., net tonnage for calculating tonnage tax, vessel name, official number) needed to calculate the fees and issue the CBP Form 1002 Tonnage Tax Certificate. The Automated Targeting System Privacy Impact Assessment discusses and analyzes the risks of using cargo information for enforcement purposes. See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CUSTOMS AND BORDER PROTECTION, PRIVACY IMPACT ASSESSMENT FOR TECS SYSTEM: CBP PRIMARY AND SECONDARY PROCESSING (TECS), DHS/CBP/PIA-056, *available at* <https://www.dhs.gov/privacy-documents-us-customs-and-border-protection>.



portal<sup>6</sup> (hereinafter “eCBP”) is accessible to customers via the Internet and collects and tracks fees from the public that were historically collected physically at the ports and documented on CBP Form 368 collection receipts by CBP Officers or collected through a cash register. eCBP uses Pay.gov, a U.S. Department of Treasury (Treasury) platform,<sup>7</sup> to collect the fee electronically. The eCBP creates electronic receipts that are emailed to the applicant and available on the eCBP for the applicant to retrieve. Users must apply for a Login.gov account to use and retrieve information on the eCBP.

eCBP facilitates electronic payments and customer self-service opportunities, while interfacing directly with CBP’s back-end financial system<sup>8</sup> or CBP’s operational trade “single window” system, the Automated Commercial Environment (ACE).<sup>9</sup> eCBP offers the trade and travel communities the ability to register and pay for the customs broker licensing exam. Additionally, eCBP allows customs brokers to complete their triennial reporting requirements and pay associated fees and is planned to enable the payment of other non-cargo related duties, taxes, and fees online as development continues.

Electronic Payment Options (ePO) incorporates features that decrease manual data entry by CBP Officers in the field to collect payments, issue receipts, deposit money, and reconcile transactions.

3. **Point of Sale (POS):** The upgraded Electronic Collection System (ECS)<sup>10</sup> software to close major financial security gaps with Personal Identity Verification (PIV)-enabled access, centralized dashboard oversight, improved controls, improved payment processing, new payment options, improved deposit processing, and a point-of-sale register that connects directly to the CBP network.

## **Mobile Collections and Receipts (MCR)**

At maritime ports of entry, much of a CBP Officer’s time is spent completing paper CBP

---

<sup>6</sup> <https://e.cbp.dhs.gov/ecbp/#/main>.

<sup>7</sup> For more information about the Treasury’s Pay.gov or other systems and tools and privacy policies, *see* <https://www.pay.gov/public/home/privacy>.

<sup>8</sup> CBP uses SAP® (which is an initialism for the original name of System Analysis Program Development), a third-party enterprise resource planning (ERP) software for its back-end financial systems and databases. The DHS Chief Financial Officer (CFO) recognizes CBP’s SAP as a Chief Financial Officer-designated core financial system used to create and maintain records of each allocation commitment, obligation, and accounts receivable issued by the Department.

<sup>9</sup> *See* U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CUSTOMS AND BORDER PROTECTION, PRIVACY IMPACT ASSESSMENT FOR THE AUTOMATED COMMERCIAL ENVIRONMENT, DHS/CBP/PIA-003, available at <https://www.dhs.gov/privacy-documents-us-customs-and-border-protection>.

<sup>10</sup> CBP continues to upgrade its systems and tools to provide efficiencies and functional improvements to the existing, out of date, cash register software. The upgraded Electronic Collections System is known as Point of Sale.



Form 368 Collections Receipts and 1002 Tonnage Tax Certificates<sup>11</sup> to collect maritime fees which include: U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection (APHIS) fees, CBP user fees (i.e., barge/bulk carriers<sup>12</sup> and commercial vessel), navigation fees and tonnage taxes, special tax, light money, miscellaneous service fees, and parole fees.

### *Rev Mod Solutions Mobile Collections and Receipts*

Rev Mod Solutions automates the 368 Cash Receipt and 1002 Tonnage Tax receipt processes transitioning CBP from a paper-based collection process to an electronic process by issuing electronic receipts (eReceipts). Modernizing the financial end of maritime collections enables CBP personnel to collect payment of maritime processing fees and issue eReceipts quickly and efficiently, while providing the payer with the ability to receive and store receipts electronically. In the Spring of 2017, Mobile Collections and Receipts was piloted at various seaports of entry (e.g., New Orleans, Louisiana; Gulfport, Mississippi; Mobile, Alabama; and Los Angeles/Long Beach, California). In June 2019, Mobile Collections and Receipts was implemented in 102 maritime ports. The rollout to additional ports was completed in September 2020. The automated process prepares CBP for future online payment capabilities using Pay.gov and the acceptance of credit cards.

The trade entities (e.g., owner/operators and designated vessel agents) are responsible for printing and presenting the eReceipts for verification of payment(s) by the CBP Officers at each port of entry. This process will remain in place until forthcoming Mobile Collections and Receipts phases can be developed and tested prior to being rolled out, which include plans to auto-generate the calculation of taxes and fees based on vessel and voyage history.<sup>13</sup> This functionality will be phased in over the next few years. Development will include verification of the automated calculations by CBP Officers. Each phase of Mobile Collections and Receipts implementation, including any new privacy risks and mitigations, will be documented in updates to this Privacy Impact Assessment, as appropriate.

---

<sup>11</sup> Pursuant to 19 CFR § 4.23, the certificate of payment and cash receipt constitutes the official evidence of payment and is presented upon each entry during the tonnage year establishing the date of commencement of the tonnage year and insuring against overpayment. In the absence of the certificate, evidence of payment of tonnage tax is obtained from the port director to whom the payment was made. Payment for tonnage tax references taxes payable for vessels and is currently limited only to such conveyances. 19 CFR § 4.20 describes tonnage taxes imposed at each entry on all vessels entering any U.S. port from any foreign port.

<sup>12</sup> A barge, or bulk carrier (or bulker), is a merchant ship specially designed to transport unpackaged bulk cargo (e.g., grains, coal, ore, steel coils, and cement).

<sup>13</sup> Automatically generated calculations will be phased in over the next couple of years. Prior to full implementation, the receiving CBP Officers are required to verify calculations before completing a receipt. These calculations (based on historical calculations and payments) are at fixed numbers or amounts per year based on how many payments have already been made. Currently, these calculations are dependent on manually collected amounts from historical receipts; however, in the future, once all receipts and payments are maintained electronically, Mobile Collections and Receipts will have the functionality to calculate amounts based on the prior collection of fees resulting from vessel arrivals and related business rules.



## **Electronic Payment Options (ePO)**

The Electronic Payment Options capability, via the public-facing eCBP, will offer the trade and travel communities the ability to pay duties, taxes, and fees online. Electronic Payment Options will reduce the amount of cash payments made at ports of entry, enabling CBP to collect better data about financial transactions and transfer the current data entry responsibility of a CBP Officer/Broker Management Officer (BMO) to external users (trade and travel payers). The project is leveraging existing payment options, such as the Treasury's Pay.gov,<sup>14</sup> to enable travelers and members of the trade community to make payments online.

The Electronic Payment Options capability on eCBP is a web-based front-end option that facilitates customer login (using Login.gov) to allow users to complete various applications online and submit fee payments via the Pay.gov site. Some of these capabilities are available now, while others will be developed and deployed in the future.<sup>15</sup> Most, if not all, applications completed by the public on eCBP contain personally identifiable information. CBP collects this information from applicants to assess their eligibility for enrollment or to comply with statutes for the payment of non-cargo duties, taxes, or fees and to deliver the collection receipts electronically to the payer. Broker information is transferred to SAP or Automated Commercial Environment financial systems, and, in the future, information will be sent to Automated Commercial Environment-Collections. The automation of payment collections, issuance of receipts, deposit of monies with the Treasury, and reconciliation of collections transactions, will decrease the time expended on these tasks by CBP Officers at the ports of entry.

Broker exam applications and payments was the first functionality to be added into the eCBP, and this functionality provides individual Customs Broker applicants the ability to apply for the Customs Broker License Exam (CBLE) and pay the associated exam fee. In addition, Customs Brokers can use the eCBP to file and pay for their Triennial Status Reports (TSR).

Other benefits of Electronic Payment Options include automated data entry of the broker application data into the Automated Commercial Environment; pre-validation of data entered into the eCBP application forms (e.g., addresses, contact information, license numbers) against data retrieved from the legacy Automated Commercial Environment broker master data records; and the customers' ability to make payments through multiple payment options using Pay.gov, including PayPal, credit and debit cards, Amazon Pay, and in the future, Automated Clearinghouse

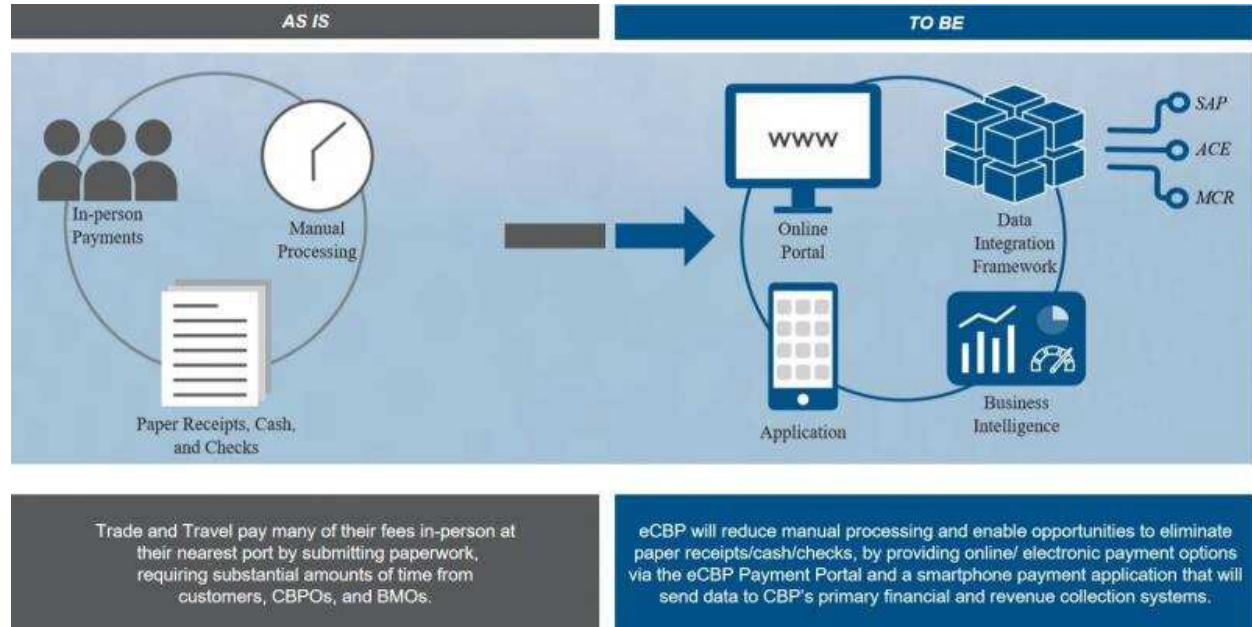
---

<sup>14</sup> The Treasury's Pay.gov suite of online services provides federal agencies with a transaction portal (for use by the public to provide input to the government) to process forms, bills, authentication decisions, collections, and for obtaining information about those transactions. The information concerns federal agency transactions involving the public, both consumers and businesses.

<sup>15</sup> At the time of original publication, eCBP collects information for the broker exam registration and Triennial Status Reports. As new eCBP use cases and functionality are implemented, CBP will update Appendix B of this Privacy Impact Assessment to document the new collections such as broker license application, permit and annual permit renewal, and trade and traveler fees.



(ACH). The architecture is designed to collect any type of online fee for CBP, with only the related data, such as amount and transaction reference number, retained.



## Point of Sale

The upgraded Point of Sale software on cash registers at ports of entry has replaced the legacy Electronic Collections System software used by the cash registers at 179 U.S. ports of entry (airports, maritime ports, rail, and vehicular traffic), including some overseas pre-clearance locations. The purpose of this system is to collect revenue in the form of duties, taxes, and other fees associated with travelers and non-cargo related collections when entering the United States.<sup>16</sup> In the process of collecting duties, taxes, and other fees, individuals may pay for such fees with cash, check, or credit card.

Through secure communications transmissions, as with all credit card transactions, Point of Sale securely sends the cardholder's credit card transaction authorization requests to the national credit card processor (processing bank) associated with the card presented as part of the larger Treasury agreement with CBP's global third-party credit card transaction vendor to process financial transactions. The information transmitted includes credit card holder name, the last 4 digits of the credit card number, transaction number, amount of transaction, merchant ID, and time and date of the transaction. A new six-digit authentication code and an eight-digit bank code will be generated for each transaction each time a credit card is swiped. Cardholder data that relates to an individual is then transmitted to the card's processing bank. These requests include an encrypted

<sup>16</sup> The collection and maintenance of accounts receivable information assists DHS in meeting its obligation to manage Departmental funds and ensures that the Department has an accurate accounting of all the money that it is owed.





package of the customer's name, credit card number, transaction amount, and transaction number. The processing bank returns an encrypted message back to the authorization-requesting cash register with an approved or denied message for that transaction.<sup>17</sup>

The Point of Sale upgrade provides a modern, secure platform upon which CBP can introduce simplified cashier processes with improved user interface; fully networked cash registers with Personal Identity Verification-enabled access; a centralized dashboard available on desktops, with the ability to register statistics such as amounts collected for the day, for supervisor and management oversight; and improved controls. Other benefits include scanning and patching by the Office of Information and Technology through the CBP network access to registers; closing Payment Card Industry (PCI) security gaps with Personal Identity Verification-enabled registers; and Europay, MasterCard, and Visa chip-card-reading capability.

The collection and storage of Social Security numbers occurs only when the payee pays by check.<sup>18</sup> Social Security numbers are stored in Point of Sale to comply with legal requirements<sup>19</sup> and are ultimately used for the purpose of debt collection, if needed. The payers will sometimes provide Social Security numbers as an identification number (ID) if they do not have a Tax Identification (Tax ID) Number (or TIN) or unique CBP ID (Importer of Record (IOR) Number or Importer ID).

The Point of Sale cash register solution, which is the front-end component of an existing integrated Electronic Collections System solution, interfaces the collections data, captured on cash registers, with the back-end system over the CBP network and DHS OneNet. No credit card numbers are sent or retained. All cardholder data supporting credit card transactions is secured via industry standard point-to-point encryption from the card reader device to CBP's global third-party credit card transaction vendor which allows users to use a chip-enabled credit or debit card and ensures accuracy. Only truncated credit card numbers are used to identify the card number associated with a transaction in accordance with credit card industry information security standards.

---

<sup>17</sup> See DHS/ALL-008 Accounts Receivable System of Records, 83 FR 65176 (December 19, 2018), available at <https://www.dhs.gov/system-records-notices-sorns>.

<sup>18</sup> CBP has the authority to collect Social Security Numbers pursuant to 31 U.S.C. § 7701(c), 26 U.S.C. § 6109(d), 19 CFR §§ 24.5 and 149.3. Social Security Numbers are used because some individuals who do not have an Employer Identification Number (EIN) or a Tax Identification Number (TIN) choose to instead submit their Social Security Number. Likewise, to meet Treasury's requirement to collect identifying information when the payment offered is check, a tax ID (Social Security Number, Employer Identification Number, Tax Identification Number) is required for deposit processing in OTCnet, a Treasury system. See the Treasury's Taxpayer Identification Number Policy and FAQs, available at <https://www.fiscal.treasury.gov/tin/>.

<sup>19</sup> See Chapter 10 Section 31001, Debt Collections Improvement Act of 1996, PUBLIC LAW 104-134—APR. 26, 1996, available at: <https://fiscal.treasury.gov/files/dms/dmdecia.pdf>. CBP Policy has also established the CBP Collections and Deposit Handbook (HB 5300-12C) for employees to reference on proper handling of information collected as part of its responsibilities of duties, taxes, and fees owed by importers.



## Section 1.0 Authorities and Other Requirements

### 1.1 What specific legal authorities and/or agreements permit and define the collection of information by the project in question?

CBP has the authority to increase the effectiveness and efficiencies of its revenue collection processes and mission at the ports of entry from the Office of Management Budget (OMB) memos, directives, and Public Law (e.g., M-15-11, Fiscal Year 2017 Budget Guidance, and the Government Performance and Results Modernization Act of 2010 (GPRA) - Public Law 111-352) calling on Departments and Agencies to increase effectiveness and reduce duplication to deliver on the government of the future. The table below outlines authorities that guide CBP’s revenue-specific mission and the Revenue Modernization Program Initiatives.

Type	Citation	Description
Statutes and regulations	Section 412(b) (2) of the Homeland Security Act of 2002 (6 U.S.C. § 212(b) (2))	Transfers revenue collections from the Treasury to CBP.
	19 CFR § 4.20, 19 CFR § 4.21, 19 CFR § 4.22, 19 CFR § 4.23, 19 CFR § 24.1(b), 19 CFR § 111.12, 19 CFR § 111.13, 19 CFR § 111.19, 19 CFR § 111.30(d), 19 CFR § 111.96, 19 CFR § 141.68, 19 CFR § 143.23-143.25, 19 CFR § 145.12, 19 CFR § 148.27, 19 U.S.C. § 1641, and 19 U.S.C. § 4322(a)(5)	Outlines revenue collection mission details.
	P.L. 103-182, Customs Modernization Act (amended the Tariff Act of 1930)	Provides CBP the authority to enforce trade law and places a greater burden on CBP to inform compliance with the trade and travel community.
Congressional Guidance	Department of Homeland Security Appropriations Bill, 2016 (S.1619), Report 114-68	States the expectation of eliminating the need for CBP Officers to accept cash for any transactions at the ports of entry by 2020.



Executive Order	13659, Streamlining Import/Export Process for America’s Business	Calls for a reduction in supply chain barriers to commerce while continuing to protect our national security, public health and safety, the environment, and natural resources.
	13571, Streamlining Service Delivery and Improving Customer Service	Calls for service improvements in quality provided to the public by the Federal Government.

CBP also has the authority to collect tax identifying information pursuant to 31 U.S.C. § 7701(c), 26 U.S.C. § 6109(d), 19 CFR § 24.5, and 19 CFR § 149.3. Social Security Numbers are used because some individuals do not have an Employer Identification Number (EIN) or a business-related Tax Identification Number and choose to instead submit their Social Security Number. Mobile Collections and Receipts and Electronic Payment Options hide/mask Social Security numbers to limit exposure. While CBP also provides the opportunity for members of the trade community to obtain an importer ID,<sup>20</sup> there is no requirement for individuals to use this alternate ID in lieu of a Social Security number or other tax number on certain imported-related filings with CBP, such as customs entry filings.

For specific authorities related to the Customs Broker Licensure program, please refer to the DHS/CBP/PIA-077 CBP Broker Management Program.<sup>21</sup>

## 1.2 What Privacy Act System of Records Notice(s) (SORN(s)) apply to the information?

To permit the collection of various types of records, Rev Mod Solutions relies on the following System of Records Notices (SORN):

- DHS/CBP-001 Import Information System, which allows for the collection of records on all commercial goods imported into the United States, along with carrier, broker, and importer user account and manifest information.<sup>22</sup>
- DHS/CBP-003 Credit/Debit Card Data System, which allows CBP to collect, use, and

<sup>20</sup> More information about how to obtain an IOR/Importer ID can be found at [help.cbp.gov](http://help.cbp.gov) under Importer Numbers. IORs/Importer IDs are authorized by 19 CFR 24.5 - Filing identification number.

<sup>21</sup> See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CUSTOMS AND BORDER PROTECTION, PRIVACY IMPACT ASSESSMENT FOR THE CBP BROKER MANAGEMENT PROGRAM, DHS/CBP/PIA-077 (2023), available at <https://www.dhs.gov/privacy-documents-us-customs-and-border-protection>.

<sup>22</sup> See DHS/CBP-001 Import Information System, 81 FR 48826 (July 26, 2016), available at <https://www.dhs.gov/system-records-notice-sorn>.



maintain records related to credit and debit card transactions.<sup>23</sup>

- DHS/CBP-027 Customs Broker Management (CBM), which allows for the collections of information from broker applicants when they register to take the Customs Broker License Exam, during the administration of the Customs Broker License Exam, when they apply for a broker's license, throughout the background investigation processes, through the triennial reporting process, and through continuing education requirements for the Customs Broker Licensure process.<sup>24</sup>
- DHS/ALL-008 Accounts Receivable, which allows for the collection of records relating to debts owed to DHS (fees/taxes).<sup>25</sup>
- DHS/ALL-004 General Information Technology Access Account Records (GITAARS), which allows for the collection of information to access and use DHS IT resources (i.e., the Mobile Collections and Receipts solution).<sup>26</sup>
- DHS/CBP-010 Persons Engaged in International Trade in Customs and Border Protection Licensed/Regulated Activities, which allows for the collection of information from individuals for the issuance of a customs broker's license.<sup>27</sup>
- Treasury/Bureau of Fiscal Service<sup>28</sup> 013Collection Records,<sup>29</sup> which allows for the Treasury's Fiscal Service and its agents to issue and process Treasury securities, make payments, identify owners and their accounts, and other customer service related transactions; and to disclose certain information to financial institutions, including banks

---

<sup>23</sup> See DHS/CBP-003 Credit/Debit Card Data System, 76 FR 67755 (November 02, 2011), available at <https://www.dhs.gov/system-records-notices-sorns>.

<sup>24</sup> See DHS/CBP-027 Customs Broker Management (CBM), 83 FR 43880 (July 22, 2022), available at <https://www.dhs.gov/system-records-notices-sorns>.

<sup>25</sup> See DHS/ALL-008 Accounts Receivable System of Records, 83 FR 65176 (December 19, 2018), available at <https://www.dhs.gov/system-records-notices-sorns>.

<sup>26</sup> See DHS/ALL-004 General Information Technology Access Account Records System (GITAARS), 77 FR 70792 (November 27, 2012), available at <https://www.dhs.gov/system-records-notices-sorns>.

<sup>27</sup> See DHS/CBP-010 Persons Engaged in International Trade in Customs and Border Protection Licensed/Regulated Activities, 73 FR 77753 (December 19, 2008) available at <https://www.dhs.gov/system-records-notices-sorns>.

<sup>28</sup> On October 7, 2012, the Secretary of the Treasury issued Treasury Order 136-01, establishing within the Treasury the Bureau of the Fiscal Service. The new bureau consolidated the bureaus formerly known as the Financial Management Service ("FMS") and the Bureau of the Public Debt ("BPD"). Treasury Order 136-01 was published in the Federal Register on May 24, 2013 (78 FR 31629). Treasury's Fiscal Service consolidated both legacy bureau's systems of records into a new set of System of Records Notices under the Fiscal Service name.

<sup>29</sup> Treasury's Fiscal Service privacy compliance documentation for financial records are available at: <https://fiscal.treasury.gov/pia.html>, and the consolidated list of Treasury System of Records Notices, are available at: <https://www.federalregister.gov/documents/2020/02/27/2020-03969/privacy-act-of-1974-system-of-records> and include TREASURY/Fiscal Service .013—Collections Records at <https://www.federalregister.gov/documents/2020/02/27/2020-03969/privacy-act-of-1974-system-of-records#:~:text=TREASURY/Fiscal%20Service%20.013%E2%80%94Collections%20Records>.



and credit unions, and credit card companies for the purpose of collections and/or investigating the accuracy of information required to complete transactions using electronic methods and for administrative purposes, such as resolving questions about a transaction.

### **1.3 Has a system security plan been completed for the information system(s) supporting the project?**

A system security plan was completed as part of the Authority to Operate package that was originally granted for the Mobile Collections and Receipts and Electronic Payment Options solutions on July 17, 2019. The Mobile Collections and Receipts/Electronic Payment Options system is designated as an Ongoing Authorization system and will not receive an updated Authority to Operate; therefore, all security and privacy controls remain valid, and the system remains in good standing under this Ongoing Authorization designation.

### **1.4 Does a records retention schedule approved by the National Archives and Records Administration (NARA) exist?**

Most of the records retained by Rev Mod Solutions are maintained in accordance with the following records schedules:

National Archives and Records Administration (NARA) General Records Schedule (GRS) 1.1, item 011: Financial transaction records related to procuring goods and services, paying bills, collecting debts, and accounting. Copies can be used for administrative or reference purposes. CBP Modified Retention: Temporary. Destroy after 24 months.

NARA GRS 5.2, item 020: Intermediary records. Retention: Temporary. Destroy upon verification of successful creation of the final document or file, or when no longer needed for business use, whichever is later.

Regarding broker examination records, CBP retains biographic records in the Automated Commercial Environment system for six years from date that the license is terminated or the death of the licensee, as applicable, including the background check records uncovered from the fingerprints used in the background check in accordance with NARA-approved agency disposition authority, "Licensing Records" DAA-0568-2017-0006-0003.

### **1.5 If the information is covered by the Paperwork Reduction Act (PRA), provide the OMB Control number and the agency number for the collection. If there are multiple forms, include a list in an appendix.**



The Paperwork Reduction Act (PRA) applies to many of the collections within Rev Mod Solutions. Each form automated within Rev Mod Solutions, in particular the collections within the eCBP, are listed in Appendix A, with their corresponding CBP form number, collection name, and Office of Management and Budget (OMB) Control Number.

## **Section 2.0 Characterization of the Information**

### **2.1 Identify the information the project collects, uses, disseminates, or maintains.**

Rev Mod Solutions collects, uses, disseminates, and maintains information about brokers/prospective brokers, the trade community, and members of the traveling public. Specifically, Rev Mod Solutions contains the following categories of information:

- Business-related or individual traveler or broker / prospective broker information: Limited to vendors and customers, and includes name of the company/agency, point of contact (name and the same contact information collected from travelers or brokers), telephone number, mailing address, email address, contract number, Automated Commercial Environment ID number (system-generated) if available, Date of Birth (DOB), Birth State/Country, and Tax Identification Number, which could be a Social Security Number in the case of broker license exam applicants, sole proprietors, or individuals making payments by check;
- Financial information: Check number, amount paid by class code; and
- Cardholder data supporting credit card transactions: Cardholder data is secured via industry standard point-to-point encryption from the card reader device to CBP's global third-party credit card transaction vendor. Only truncated credit card numbers are used to identify the card number associated with a transaction in accordance with Payment Card Industry compliance, which is an information security standard for all organizations that handle payments from branded credit cards from the major card schemes. No credit card numbers are sent or retained.

See Appendix A for a complete list of all information collected.

### **2.2 What are the sources of the information and how is the information collected for the project?**

All information collected as part of Rev Mod Solutions is either collected directly from the individuals (brokers, prospective brokers, vessel owners and agents, or travelers) or sourced from the Automated Commercial Environment or the Vessel Management System by direct interface. Individuals either key their information directly into the eCBP, or they provide their information to the CBP Officer or cashier who is handling the transaction.



**Mobile Collections and Receipts:** In Mobile Collections and Receipts, the vessel data is sourced from the Vessel Management System (specifically, its subsystem, the Vessel Risk List) within the Automated Targeting System (ATS) and pulls various parameters (e.g., net tonnage for calculating tonnage tax, vessel name, International Maritime Organization number, official number) needed to uniquely identify vessels and to calculate the fees and issue the 1002 Tonnage Tax Certificate.

Payer information is sourced directly from the broker, vessel owner/operator, or traveler at time of payment and entered in the Mobile Collections and Receipts by the CBP Officer (e.g., name, Tax ID, Social Security Number, address, email, point of contact name, phone number). Social Security numbers and dates of birth are collected from broker exam applicants to process broker license exam applications. Tax IDs are collected from vessel agents and owner operators to process receipts for vessel entrance and clearance.

**Electronic Payment Options:** When available, Electronic Payment Options prepopulates historical and biographical data interfaced from the Automated Commercial Environment legacy broker master record from previous applications with CBP (e.g., when filing a broker Triennial Status Report) into the eCBP broker related applications. The individual filing the application is then responsible for verifying the data is still accurate and/or providing the data directly in the online system.

**Point of Sale:** Point of Sale data is sourced directly from the individual making the payment at a cash register.

### **2.3 Does the project use information from commercial sources or publicly available data? If so, explain why and how this information is used.**

Rev Mod Solutions collects information directly from individuals and organizations engaged in trade and travel and not from commercial sources or publicly available data.

### **2.4 Discuss how accuracy of the data is ensured.**

Consistent with DHS Management Directive 4300A,<sup>30</sup> Rev Mod Solutions user roles and access controls are established following the separation of roles and duties principle. Each of the Mobile Collections and Receipts, Electronic Payment Options, and Point of Sale solutions inherently create access checks when processing transactions by limiting the user to only those transactions allowed by the role, and which are limited by segregation of duty principles, which in turn supports accurate and correct data. The system includes checks and balances to ensure data accuracy – for example, pre-populating data fields where available from prior transactions to

<sup>30</sup> See <https://www.dhs.gov/publication/dhs-4300a-sensitive-systems-handbook>.



ensure data is not keyed incorrectly, validating against lists of valid values for fields, and reconciling receipts against Treasury deposit confirmations and back end financial and collection systems to ensure data is in sync. Each solution employs user roles and access controls that ensure no one user can create and approve a single financial transaction.

**Mobile Collections and Receipts:** With Mobile Collections and Receipts automation, the quality of data input is ensured through drop-down menus, mandatory fields, and electronic calculations. Data is reviewed with the customer and checked by CBP officers using the supervisor review option in the system.

**Electronic Payment Options:** Where possible, Electronic Payment Options prepopulates historical and biographical data interfaced from the Automated Commercial Environment legacy from previous applications with CBP (e.g., broker master data prepopulated from the Automated Commercial Environment when filing a broker Triennial Status Report) into eCBP applications and allows the user the ability to update or correct such information in the application screens. Electronic Payment Options also uses mandatory fields, drop-down menus for fixed answer fields, and requires dual verification of key fields to ensure data accuracy.

**Point of Sale:** Point of Sale data entry is limited through implementation of user menu items, which include mandatory fields that have automated data edits and electronic calculations. All cardholder data supporting credit card transactions is secured via industry standard point-to-point encryption from the card reader device to CBP's global credit card transaction vendor. This secure transfer of cardholder information from the point of collection promotes accuracy by eliminating the need to manually input the data. Per the Payment Card Industry Data Security Standards 3.0, all Point of Sale registers (terminals) exist on a separate virtual private network, set aside from all other port of entry computers to ensure data integrity and system security which in turn also ensures accuracy.

## **2.5 Privacy Impact Analysis: Related to Characterization of the Information**

**Privacy Risk:** There is a risk that the Rev Mod Solutions collects more personally identifiable information than is necessary to collect, secure, process, and report fees from individuals and organizations engaged in lawful trade and travel in the United States.

**Mitigation:** This risk is mitigated. CBP program offices, the CBP Privacy Office, and the DHS Privacy Office have worked together to ensure that CBP only collects the information necessary to accurately collect and record financial transactions and to transmit receipts electronically to the payers. CBP collects data directly from source systems or the individual payer. Rev Mod Solutions does not alter or transform the values of data in any way. Source systems routinely undergo rigorous automated and manual data quality checks. These data quality checks validate that the source system data is accurate, complete, and up to date as it is ingested and that





it is properly associated with the correct individual based on unique identifiers.

**Privacy Risk:** There is a risk that Mobile Collections and Receipts will auto-generate inaccurate taxes and fees based on vessel and voyage history.

**Mitigation:** This risk is mitigated. As this functionality is deployed, CBP Officers will verify the calculations before completing a receipt. Calculations are based on history and dependent on all receipts being entered into Mobile Calculations and Receipts. Mobile Calculations and Receipts calculates the amount due based on the number of times a vessel arrived and paid a certain fee, which will likely be more accurate than manual calculations. However, a CBP Officer will continue to check and validate whether any manual receipts have been paid and will ensure the auto generated calculations are correct before payment is collected.

## Section 3.0 Uses of the Information

### 3.1 Describe how and why the project uses the information.

CBP uses Rev Mod Solutions to ensure all payer(s) records from individuals and organizations engaged in lawful travel and trade are properly updated to verify payment of each specific duty, tax, or fee. All payer information captured, as well as the details associated with each transaction, is necessary to ensure payment records are appropriately updated. For example, Mobile Collections and Receipts defaults fees when a draft receipt is created for the officers to verify, and facilitates updated fees owed based on the vessel paperwork submitted by the agents.

Additionally, CBP collects biographic broker information to automate broker applications for broker exams and broker Triennial Status Reports, and to conduct a background investigation to verify an individual's broker eligibility. CBP uses the data to verify applications and to ensure broker data is current.

Vessel information is used to collect maritime fees.<sup>31</sup> CBP Officers check the information on the receipts from prior arrivals in the United States to confirm status and amount of maritime fees due.

### 3.2 Does the project use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly? If so, state how DHS plans to use such results.

Rev Mod Solutions does not use technology to conduct electronic searches, queries, or

---

<sup>31</sup> Code of Federal Regulations Title 19 outlines the regulations related to Customs Duties. Customs Financial and Accounting Procedures, including maritime fees and other fees for certain services, are outlined in Title 19, Chapter 1, Part 24 (19 CFR § 24.22).



analyses in electronic databases for predictive analyses.

### **3.3 Are there other components with assigned roles and responsibilities within the system?**

No other DHS components have assigned roles and responsibilities within Rev Mod Solutions. Internal use and maintenance of the solutions are by CBP personnel only.

### **3.4 Privacy Impact Analysis: Related to the Uses of Information**

**Privacy Risk:** There is a risk of unauthorized access or unauthorized use of information by authorized users.

**Mitigation:** This risk is mitigated. Access controls, such as administrative passwords and restrictive rules regarding database access, ensure that only authorized users can access the Mobile Collections and Receipts, Electronic Payment Options, and Point of Sale solutions and use the information in accordance with authorized activities, and only within the parameters of its information sharing agreements. Authorized users are a sub-set of authorized CBP users who have access to the Automated Commercial Environment.

Consistent with DHS Management Directive 4300A, Rev Mod Solutions user roles and access controls are established following the separation of roles and duties principle, which inherently creates access checks in the Mobile Collections and Receipts, Electronic Payment Options, and Point of Sale solutions. The user is limited to only those transactions allowed by their established role, which are limited by segregation of duty principles. Each solution employs user roles and access controls to ensure no one user can create and approve a single financial transaction.

## **Section 4.0 Notice**

### **4.1 How does the project provide individuals notice prior to the collection of information? If notice is not provided, explain why not.**

CBP operations and collection authorities are made public through NARA's Code of Federal Regulations (CFR) website (at: <https://www.ecfr.gov>), and the U.S. Government Printing Office (GPO) GovInfo website (at: <https://www.govinfo.gov>). The following provide notice of CBP's authorities under Title 19 of the United States Code (U.S.C.) and the corresponding Title of the Code of Federal Regulations, including but not limited to: 19 CFR § 4.20, 19 CFR § 4.21, 19 CFR § 4.22, 19 CFR § 4.23, 19 CFR § 24.1(b), 19 CFR § 111.12, 19 CFR § 111.13, 19 CFR § 111.19, 19 CFR § 111.30(d), 19 CFR § 111.96, 19 CFR § 123.4, 19 CFR § 141.68, 19 CFR § 143.23-143.25, 19 CFR § 145.12, 19 CFR § 148.27, 19 U.S.C. § 1641, and 19 U.S.C. § 4322(a)(5);



all of which can be found by searching either the NARA or GPO websites.

Additional notice is provided to the traveling public and trade communities when specific forms are used in conjunction with collections of information and payments made to CBP. All forms that collect information from the public and fall under the Paperwork Reduction Act site the specific authority at the top of the form and include a Privacy Act Statement (or notice) in the section of the documentation at which personally identifiable information is collected. CBP also collects information from brokers and has a comprehensive regulatory framework for trade and travel fee processes and procedures, leveraging existing communications channels on the CBP Trade reference pages for Customs Brokers.<sup>32</sup> DHS and CBP also provide information via Federal Register Notices (FRN) related to collections of fees and information.

The primary notice for Rev Mod Solutions system is this Privacy Impact Assessment, which is published on the external DHS Privacy website.

## **4.2 What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project?**

**Mobile Collections and Receipts:** Mobile Collections and Receipts requires collection of data regarding vessel arrivals for completion of the CBP 368 Cash Receipt and the 1002 Tonnage Tax Certificate. CBP Officers enter data provided by vessel agents or owners into Mobile Collections and Receipts. Opting out of providing this information and not completing the requirements results in vessels unable to leave the port.<sup>33</sup>

**Electronic Payment Options:** Brokers are required to provide information in eCBP to either apply to take the Customs Broker License Exam and/or submit a Triennial Status Report on their license. Opting out of providing this information and not completing the requirements would render them unable to serve as licensed Customs Brokers.<sup>34</sup> Brokers will have the option to apply and pay for Broker licenses and permits on eCBP (future functionality).<sup>35</sup>

Likewise, in the future, trade and traveler users may either make online fee payments via eCBP (e.g., traveler related taxes, fees, and duties) or pay the fees in person at a port of entry, unless specifically designated by legislation. See Appendix B for all current use cases.

**Point of Sale:** CBP cashiers use a Point of Sale machine to collect the manual payments made by a customer. Therefore, at the time of a collection when the payee is paying by check, individuals may decline to provide information, but failure to provide the information may result

---

<sup>32</sup> See <https://www.cbp.gov/trade/programs-administration/customs-brokers#>.

<sup>33</sup> See 19 CFR § 4.20, 19 CFR § 4.21, 19 CFR § 4.22, 19 CFR § 4.23, 19 CFR § 24.1 (b), 19 CFR § 123.4, 19 CFR § 141.68, 19 CFR §§ 143.23-143.25, 19 CFR § 145.12, and 19 CFR § 148.27.

<sup>34</sup> See 19 CFR § 111.12, 19 CFR § 111.13, 19 CFR § 111.19, 19 CFR § 111.30(d), 19 CFR § 111.96.

<sup>35</sup> The current scope of eCBP is limited to Broker exam and triennial fees, with the remaining Broker fees in the process of being added. Rev Mod Solutions will update communications as more fees are added.



in the failed processing of a financial transaction.

### 4.3 **Privacy Impact Analysis: Related to Notice**

**Privacy Risk:** There is a risk that individuals may not know how their biographic information is used or with which other agencies their biographic information is shared.

**Mitigation:** This risk is partially mitigated. The relevant Privacy Act Statements are placed on the eCBP home page and on the electronic forms to identify authorities, routine uses, and purpose for collection. The Privacy Act Statements also include a link to the relevant System of Records Notices which explain how the data is used and with whom it may be shared. The routine uses of the relevant System of Records Notices identify partners outside of DHS, if any, who may receive information.

For the Point of Sale and Mobile Collections and Receipts solutions, CBP Officers and cashiers may explain to the customers the need for certain information while they are collecting it.<sup>36</sup>

## Section 5.0 Data Retention by the Project

### 5.1 Explain how long and for what reason the information is retained.

**Mobile Collections and Receipts:** Mobile Collections and Receipts retains vessel-related informal duty<sup>37</sup> and fee data for 18 months to allow for automated calculation of fees based on 12-month fee lifecycle dependencies.

**Electronic Payment Options:** The accounting system of record (SAP or the Automated Commercial Environment) will maintain the financial records for the duration of the applicable retention standard of 24 months. Electronic Payment Options' architecture is designed to only retain data related to the online transaction, such as the amount and transaction reference number.

Biographic broker master record information transmitted to the Automated Commercial Environment is retained for six years from the date that the broker license is terminated or the death of the licensee, as applicable (consistent with "Licensing Records" DAA-0568-2017-0006-0003).

**Point of Sale:** The accounting system of record (ACE) will maintain the transaction receipt records for the duration of the retention standard per GRS 1.1 Item 011. The Point of Sale registers will maintain back-up receipt records for 24 months to ensure all receipt details transmit appropriately into the system of record during the port-level deposit process. No credit card

---

<sup>36</sup> Additional information is available from the CBP Revenue Division Directory on the CBP website at: <https://www.cbp.gov/document/publications/revenue-division-directory>.

<sup>37</sup> Informal duty is a duty, rather than a fee, that is collected by CBP during the informal entry process of importing goods with a total value less than \$2,500.



numbers will be retained.

## 5.2 Privacy Impact Analysis: Related to Retention

**Privacy Risk:** There is a risk Rev Mod Solutions collect and retain data for a longer period than needed.

**Mitigation:** This risk is partially mitigated. CBP follows the guidance provided by NARA, and CBP implemented a process to perform an annual manual assessment to ensure the guidance is followed and data has been automatically deleted. However, the Mobile Collections and Receipts, Electronic Payment Options, and Point of Sale solutions incorporate functionality to allow CBP users to export reports and files directly to their local computer terminals, in which case the user is responsible for managing the records thereafter. CBP manages Mobile Collections and Receipts and Electronic Payment Options users through policy and training which provides CBP users with the applicable retention schedules for financial information, and data retention schedules follow the guidance provided by NARA, regardless of where it is maintained by Rev Mod Solutions or its users.

## Section 6.0 Information Sharing

### 6.1 Is information shared outside of DHS as part of the normal agency operations? If so, identify the organization(s) and how the information is accessed and how it is to be used.

To process payments, Point of Sale integrates credit card transactional information with CBP's global third-party credit card transaction vendor.<sup>38</sup> Other Rev Mod Solutions currently do not share data with any entities outside of DHS. Rev Mod Solutions share transactional data with the CBP financial systems of record which may share data with the Treasury system. The eCBP is a direct gateway to Pay.gov where users can submit payments directly.

### 6.2 Describe how the external sharing noted in 6.1 is compatible with the SORN noted in 1.2.

CBP shares financial transactional data with the Treasury's system. A Memorandum of Understanding (MOU) exists between Point of Sale and the global third-party credit card transaction vendor for the secure processing of credit card data.

CBP does not store credit card information. CBP uses Treasury's Pay.gov and a global third-party credit card transaction vendor's solution to collect, encrypt, and process credit card data. Only the resulting approval/denial of the card payment is stored in CBP's Point of Sale

---

<sup>38</sup> CBP is not a financial institution and cannot process payments without sharing with a third-party transaction vendor.



application logs and software, using the last 4 digits of the card used. Treasury's System of Records Notice which supports this activity is referenced at: <https://www.federalregister.gov/documents/2016/11/07/2016-26662/privacy-act-of-1974-systems-of-records>.

### **6.3 Does the project place limitations on re-dissemination?**

Credit card data shared with CBP's global third-party credit card transaction vendor is prohibited from re-dissemination per Payment Card Industry regulations.

### **6.4 Describe how the project maintains a record of any disclosures outside of the Department.**

Any requests for information, especially personally identifiable information, are required to be documented in DHS Form 191, a form used to track DHS disclosures of information.

### **6.5 Privacy Impact Analysis: Related to Information Sharing**

**Privacy Risk:** There is a privacy risk that CBP could share data outside DHS for purposes that differ from the stated purpose and use of the original collection.

**Mitigation:** This risk is mitigated. While Rev Mod Solutions currently does not share personally identifiable information with any entities outside of DHS, CBP and DHS may share information externally pursuant to routine uses found in the applicable System of Records Notices listed in Section 1.2 of this document. All disclosures of personally identifiable information outside of the Department must be documented on DHS Form 191. Moreover, Rev Mod Solution users receive role-based trainings that reinforce proper disclosure protocols.

## **Section 7.0 Redress**

### **7.1 What are the procedures that allow individuals to access their information?**

**Electronic Payment Options/eCBP information:** Individuals/organizations who have opened a Login.gov account and filed data in eCBP (for example, Broker license exam application, Broker Triennial Status Reports) via that account, may access the data that was filed using the login account. The Trusted Worker Program System (TWP) Privacy Impact Assessment



supporting Broker Management<sup>39</sup> and the newly issued DHS/CBP-027 Customs Broker Management System of Records Notice also provide additional information.<sup>40</sup>

**Mobile Collections and Receipts information:** Individuals/organizations who have received a Mobile Collections and Receipts receipt may request additional information or a copy of the receipt from the issuing Port of Entry by providing the Mobile Collections and Receipts receipt number, company name, address, vessel name, and date of receipt.

Individuals seeking access to other information may file a Freedom of Information Act (FOIA) request with CBP at: <https://www.cbp.gov/site-policy-notice/foia/records> or by mailing a request to:

U.S. Customs and Border Protection  
Freedom of Information Act Division  
1300 Pennsylvania Avenue NW, Room 3.3D  
Washington, D.C. 20229  
Fax Number: (202) 325-1476

All Privacy Act and Freedom of Information Act requests must be in writing and include the requestor's daytime phone number, email address, and as much information as possible about the subject matter to expedite the search process. Requests for information are evaluated by CBP to ensure that any release of information is lawful; will not impede an investigation of an actual or potential criminal, civil, or regulatory violation; and will not reveal the existence of an investigation or investigative interest on the part of DHS or another agency.

**Point of Sale information:** CBP cashiers use a Point of Sale machine to collect the manual payments made by members of the trade or travel community to process financial transactions. Accordingly, there is no individual information for the customer to access once the financial transaction is complete.

## 7.2 What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?

There are multiple options for individuals to correct inaccurate or erroneous information in Rev Mod Solutions systems.

Electronic Payment Options information: For Customs Broker License Exam (CBLE) applicants, returning applicants may change name, birthplace, address, and contact information

---

<sup>39</sup> See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CUSTOMS AND BORDER PROTECTION, PRIVACY IMPACT ASSESSMENT FOR THE TRUSTED WORKER PROGRAM SYSTEM (TWP), DHS/CBP/PIA-062, available at <https://www.dhs.gov/privacy-documents-us-customs-and-border-protection>.

<sup>40</sup> See DHS/CBP-027 Customs Broker Management (CBM), 83 FR 43880 (July 22, 2022), available at <https://www.dhs.gov/system-records-notice-sorns>.



when applying for a new exam. For other changes to the Customs Broker License Exam data entered into eCBP, a ticket must be opened with the Rev Mod Solutions service desk at: [revmodservicedesk@cbp.dhs.gov](mailto:revmodservicedesk@cbp.dhs.gov). The CBP Broker Management Branch (BMB) will review the request and supporting documentation, and authorized users will make appropriate edits in a limited access maintenance transaction. Brokers may provide new address and contact information on eCBP but must also immediately notify the CBP Broker Management Branch of changes. If a Broker License number or date of issue is incorrect in the system, resulting in the inability to file a Triennial Status Report, Brokers must contact the Rev Mod Solutions Service desk to request a correction in writing. The CBP Broker Management Branch will review the request and supporting documentation, and authorized users will make appropriate edits in a limited access maintenance transaction.

Brokers with active accounts in the Automated Commercial Environment may amend, correct, or cancel their active data in the system. Other changes may be made as provided in the Trusted Worker Program System Privacy Impact Assessment supporting Broker Management.

Individuals who believe that records in Customs Broker systems maintain incorrect or inaccurate information may direct inquiries to the Broker Management Branch by email to [BrokerManagement@cbp.dhs.gov](mailto:BrokerManagement@cbp.dhs.gov), or via mail here:

U.S. Customs and Border Protection  
Office of Trade  
Trade Policy and Programs, Broker Management Branch  
1331 Pennsylvania Ave NW  
9th Floor - Broker Management Branch  
Washington, DC 20229-1142

Individuals making inquiries should provide as much identifying information as possible regarding themselves to identify the record(s) at issue.

**Mobile Collections and Receipts Information:** Individuals/organizations who have received a Mobile Collections and Receipts receipt may request changes to organization name, address, and contact email from the issuing port of entry by referencing the receipt number. CBP Officers at the port of entry will review the request and supporting documentation, and authorized users will make appropriate edits in Mobile Collections and Receipts using a limited access maintenance transaction. Additional inquiries and efforts to request assistance for correction of CBP records may also be directed by email to the Rev Mod Service Desk.

Lastly, as these records are covered by the Privacy Act of 1974, individuals wishing to correct inaccurate information may submit a Privacy Act Amendment request through the same access process explained in Section 7.1 or may email to: [privacy.cbp@cbp.dhs.gov](mailto:privacy.cbp@cbp.dhs.gov).





### **7.3 How does the project notify individuals about the procedures for correcting their information?**

Through the publication of this Privacy Impact Assessment, individuals seeking notification of and access to any record contained in Rev Mod Solutions are informed that they may submit a request through the procedures noted in Sections 7.1 and 7.2 above. Notice is also provided by the governing System of Records Notices described in Section 1.2.

### **7.4 Privacy Impact Analysis: Related to Redress**

**Privacy Risk:** There is a risk that decisions are made regarding brokers based on incomplete/incorrect information because individuals cannot correct their information.

**Mitigation:** This risk is mitigated. Individuals who file information electronically may amend, correct, or cancel their active data, and Automated Commercial Environment system updates will reflect these changes. Individuals may also contact the CBP INFO Center at <https://help.cbp.gov/> to request correction of erroneous eCBP and Automated Commercial Environment information. CBP further mitigates this risk by allowing individuals to contact CBP when they believe that the data contained in eCBP and Automated Commercial Environment is inaccurate. Individuals may submit corrections electronically and are required to meet standards of quality, accuracy, and timeliness in updating their data in eCBP and the Automated Commercial Environment. If any individual believes a charge was made in error, they can contact their individual credit card provider to dispute the charge.

## **Section 8.0 Auditing and Accountability**

### **8.1 How does the project ensure that the information is used in accordance with stated practices in this PIA?**

CBP has implemented security controls and technology features that incorporate protection of information and mitigate privacy risks. Through audit logs, Rev Mod Solutions records identify events containing user information, date, time, and actions taken to provide an overall accounting of events. CBP reviews audit logs and conducts periodic reviews of all user activity.

### **8.2 Describe what privacy training is provided to users either generally or specifically relevant to the project.**

The following training is provided to CBP internal users of Rev Mod Solutions:

- Mobile Collections and Receipts/Electronic Payment Options user training includes reference guides, standard operating procedures, and webinars/web-based training. This training is an optional web-based training that is scheduled quarterly. It provides feature updates and information and aids the ports in bid and rotation training. Mobile Collections



and Receipts/Electronic Payment Options reference guides, standard operating procedures, and other instructional documentation are updated as new features impact existing documents or require new documents.

- Mobile Collections and Receipts role-based training is an optional web-based training that is scheduled quarterly. It provides feature updates and information and aids the ports in bid and rotation training.
- Annual Payment Card Industry training is required training. Users lose access to Point of Sale system if training is not completed.
- CBP Broker Management Branch training is an optional that is scheduled quarterly.
- Broker Management Officer training is an optional that is scheduled quarterly.
- Point of Sale user training, includes reference guides, standard operating procedures, and webinars/web-based training. This is an optional/as-needed annual refresher training that is scheduled and offered upon request.

### **8.3 What procedures are in place to determine which users may access the information and how does the project determine who has access?**

CBP officials may obtain access to the Mobile Collections and Receipts/Electronic Payment Options data only on a “need to know” basis and after their supervisor and the business owner have authorized their access. Authorized users obtain electronic access through the CBP network through encrypted passwords and sign-on identification.

User roles are defined for each solution, with limited privileges assigned to each role. Each user is assigned applicable roles based on a “need to know.” For example, the solutions have different roles for administrative activities (ability to adjust business rule related data), read only roles, approval roles, and regular data entry roles.

### **8.4 How does the project review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within DHS and outside?**

Rev Mod Solutions shares data with the CBP financial system of record, which in turn shares data with Treasury’s Pay.gov system.

A Memorandum of Understanding exists between CBP Point of Sale and the Treasury’s Fiscal Service global third-party credit card transaction vendor for the secure processing of credit card data.



## Contact Official

Scott S. Miller  
Revenue Modernization, Office of Finance  
U.S. Customs and Border Protection  
U.S. Department of Homeland Security

## Responsible Official

Debra L. Danisek  
CBP Privacy Officer  
U.S. Customs and Border Protection  
U.S. Department of Homeland Security  
[Privacy.cbp@cbp.dhs.gov](mailto:Privacy.cbp@cbp.dhs.gov)

## Approval Signature

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

---

Mason C. Clutter  
Acting Chief Privacy Officer  
U.S. Department of Homeland Security  
(202) 343-1717



## APPENDIX A: CBP Forms Automated by Revenue Modernization *April 12, 2023*

Rev Mod will evolve as the various labor-intensive revenue collection processes at CBP are assessed and automated. This Appendix provides a comprehensive overview of the information collected by CBP using Rev Mod Solutions, to collect duties, taxes, fees, and other payments to the U.S. government. The forms listed below include future planned forms that will be added to eCBP.

### 1. **CBP Form 368/Form 1002** - Collection Receipt or Informal Entry and Customs Form 1002 Tonnage Tax Certificate

CBP Form 368 Collection Receipt or Informal Entry is used by CBP to provide its customers with a receipt at time of collection of various duties, taxes, and fees at ports of entry. The Mobile Collections and Receipts project replaces the paper Form 368 receipts with an electronic receipt. Maritime arrival fees paid by CBP customers may include Tonnage Tax Form 1002 recording the receipt of Tonnage Tax paid at a port of entry. Mobile Collections and Receipts replaces paper Form 1002 with an electronic certificate of payment attached to the Form 368 e-Receipts.

<b>Vessel Information</b>
• Receipt #
• Receipt Date
• Arrival Port
• Last Foreign Country
• Last Foreign Port
• Navigating Coastwise (Check box)
• Vessel Name
• Net Tonnage
• Tonnage Year Start
• International Maritime Organization Number (IMO #)
• Official Registration
• Number Type
• Carrier Email
• Country Flag
• SCAC Code

<b>Other Data</b>
• SEACATS Case number
• CBP Authorized Signature (First Last Name)
• From (Foreign Port) – specific to 1002 only
<b>Business Payer Data</b>
• Business Payer Company Name
• Employer Identification Number/Taxpayer Identification Number
• Vessel Agent (Check box)
• Owner Operator (Check box)
• Business Payer Address Street Number
• Street Name
• Suite/Apartment Number



• Country
• State
• City
• Zip
• Corporate Phone number
• Corporate Email address
• Business Payer Contact Title
• First Name
• Middle Name
• Last Name
• Suffix
• Primary Phone number
• Cell Phone number
• Primary Email address
<b>Traveler Payer Data</b>
• Traveler Payer Title
• First Name
• Middle Name
• Last Name
• Suffix
• Social Security number (if other identifier not provided)
• Traveler Payer Address and Street Number
• Street Name

• Suite/Apartment Number
• Country
• State
• City
• Zip
• Contact Traveler Title
• Primary Phone number
• Cell Phone number
• Primary Email address
<b>Class Code data</b>
• Class Code (s)
• User Charge Code (s)
• Description
• Rate
• Quantity
• Individual Class Code Amount
• Reason Code
• Comment
<b>Payment Information</b>
• Payment Type (e.g., check, cash)
• Check Number
• Total Amount

The class code data is internal and can identify the different types of fees, such as vessel fees, broker fees, traveler fees (such as immigration and informal duty); including Fines, Penalties and Forfeitures (FP&F).

## 2. CBP Form 3124E/OMB # 1651-0034 - Application for Customs Broker License Exam

This form is fully automated and broker exam applicants must use the eCBP Portal to apply and pay for the Customs Broker License Exam.

### Information CBP collects from applicants:



- Full Name
- Mailing Address and Residence Address
- Email Address
- Date of Birth (DOB)
- Birthplace (City and State)
- Citizenship
- Social Security number
- Home Phone Number
- Business Phone Number
- Additional Questions (Yes or No Responses):
  - Does this Applicant seek modifications under the Americans with Disabilities Act? (Indicator of Reasonable Modification Request is collected)
    - If the answer to this question is yes, the applicant must provide the following details:
      - The limitations resulting from their disability;
      - Barriers to their effective participation in the standard electronic version of the exam based on their limitations; and
      - Their preferred or suggested reasonable modifications to remove the barriers to effectively participate in the exam.
    - Is this Applicant an Officer or Employee of the United States?
  - Remarks (Blank area the applicant can use to add additional remarks related to the Americans with Disabilities Act question above)
  - Signature of applicant.

### **3. CBP Broker Triennial Status Report (No CBP Form Number)/OMB # 1651-0034 - Triennial Status Report (TSR) (Future)**

The triennial process consists of a status report and fee payment that must be submitted every three years by all licensed brokers, whether they are licensed as an individual, corporation, partnership, or association. (19 CFR §§ 111.30(d) & 111.96(d)). CBP collects the Triennial Status Report information through the CBP electronic web application, eCBP Portal.

#### **CBP collects the following information on the Triennial Status Report:**

- Name (First, Last, Middle Initial)



- Customs broker license number
- Personal mailing address
- Personal email address
- Whether actively engaged in transacting customs business (Yes/No)
  - If actively engaged, please provide the name and address of business
  - If employed by a broker, and if so, please provide the name and address of employer
- Whether they have engaged in conduct that could constitute ground for suspension or revocation of license (Yes/No)
- An attestation that they are not a federal employee
- Employee list for all employees of a Customs Broker, including:
  - Name (First, Last)
  - Social Security Number
  - Date of Birth
  - Place of Birth
  - Home Address (Street, City, State, Zip Code)
- Payment Information
  - Fee Amount
  - Payer Name
  - Payee Email Address
- Proof of continuing education<sup>41</sup>

#### 4. Broker License (Future)

A person must obtain a Broker license to transact customs business as a broker. The future Rev Mod functionality could include the data listed below as relevant to either an individual or corporation. Broker License and Permit master data information in Mobile Collections and

---

<sup>41</sup> The Triennial Status Report must be accompanied by the fee prescribed in 19 C.F.R. § 111.96(d) and must be addressed to the director of the port through which the license was delivered to the licensee. A report received during the month of February will be considered filed timely. No form or format is required.



Receipts is brought over from the Automated Commercial Environment to support Triennial Status reports on eCBP.

**Information collected:**

- License Name
- License Type
- License Issue Port
- License Holder Filer Code
- Sole Proprietor (option Yes or No)
- Suspension Letter Date
- Status prior to suspension
- Suspension Letter (Yes or No Option)
- Comments
- Residence Address (Individual brokers)
- Business Address (Sole Proprietor brokers and Org Brokers)
- PO Box
- Street Number
- Street Name
- Apt, Suite, Unit #
- City
- State/Province
- Zip
- Country
- Change Comments
- Phone number, email of the Individual License holder
- Contact email and website for Organization License holder
- Has the applicant ever applied for a Customs Broker License (yes or no);
- Has the applicant (or any Officer, Member, or Principle) ever had a licensed suspended, refused, revoked, or cancelled? (yes or no);





- Is this applicant (or any Officer, Member, or Principle) and Officer or Employee of the United States? (yes or no);
- Tax Identification Number, or Employer Identification Number.

## 5. Broker Permit (Future)

A permit (see § 111.19) is required for a broker conducting customs business (this is generated by CBP in the Automated Commercial Environment).

### **Information collected:**

- Permit Type
- Permit Status
- Permit Number
- Issued Port
- Application Port
- Issued Date
- Permit Address
- Created By Name
- Created By Hash
- Create Date/time
- Updated By Name
- Updated By Hash
- Update Date/time
- Licensed Broker Permit qualifier name
- Qualifier License Number

## 6. Broker License Suspension Letter

A Broker who does not file a Triennial Status Report in the required timeframe will receive a suspension notice. This is generated by CBP as a suspension letter and mailed/mailed to the broker.

### **Information collected:**

- Letter Date
- Close Day Status
- Suspension Letter
- Broker Management Office Email
- Created By Name
- Created By Hash ID
- Create Datetime
- Updated By Name
- Updated By Hash ID

#### **7. Point of Sale (POS) - Cash Register Transactions**

Limited data is collected from the traveling public at the time of collection at a Point of Sale cash register at a port of entry.

##### **Information collected:**

- Social Security number / Employer Identification Number / Tax Identification Number / IOR Number or Importer ID
- Driver's License
- Credit card holder name
- Last 4 digits of the credit card
- Credit Card transaction number from CBP's global third-party credit card transaction vendor
- Class Code(s) collected and amounts of each collection transaction
- Time and date of each transaction
- CBP Port number
- Reference Data associated with the transaction



## APPENDIX B: eCBP Portal Use Cases

*April 12, 2023*

### 1. Trade

#### a) Brokers

The eCBP Portal provides individuals an automated way to register for the Customs Broker License Examination (CBLE) and to submit a Triennial Status Report (TSR) which is required of licensed customs brokers. Applicants registering to take the Customs Broker License Exam must first access the eCBP Portal available at <https://e.cbp.dhs.gov/ecbp/#/main>, and then must select, “Trade” and “Brokers.” From here the applicant will be directed to the eCBP Broker home page. The eCBP Broker home page displays the DHS Privacy Act Statement. Applicants must select “License Exam,” then consent to a DHS Security Notification, and will be directed to Login.gov. Users must create a new or open an existing Login.Gov account to access the License Exam page.

Login.Gov ensures a secure connection and identity verification for eCBP Portal users. To register with Login.gov, users must provide an email address and a phone number and create a password. Login.gov does not share any information provided by the user with CBP other than a user ID to prevent multiple registrations with the same user ID. Once the user has logged in via Login.gov, they will be directed to the License Exam page, which is an electronic version of CBP Form 3124e (OMB # 1651-0034). The information collected on the CBP Form 3124e is discussed in detail above in this Privacy Impact Assessment.

Additionally, the eCBP Portal collects the following information from the broker examinee at the time of registration: Remote/In-Person (select either option), or the affiliated CBP port. Once the individual enters all data elements, they will then submit their application. The eCBP Portal will then direct the applicant to Pay.gov to pay the exam registration fee. The eCBP portal uses Pay.gov, a U.S. Department of Treasury platform, to collect and submit fee payments. The eCBP portal then creates an electronic receipt and this is emailed to the applicant and is also available on the eCBP portal for the applicant to retrieve.

The eCBP Portal provides Customs Brokers an automated way to submit their Triennial Status Report and associated fee every three years. The Triennial Status Reports requires licensed customs brokers to provide information related to whether a broker is actively engaged in customs business and identifying information for the brokerage business or individual broker license to ensure the broker continues to meet the requirements to hold a broker’s license and provide CBP up-to-date contact information for the broker. No form or particular format is required for the Triennial Status Report. Customs Brokers submitting their Triennial Status Report must access the eCBP Portal as described above. Once they have accessed the Brokers homepage, they must select “Triennial Status Report,” and then consent to a DHS Security Notification. After consenting to



this notification, they will be directed to Login.gov, and must proceed through the Login.gov steps as described above. Once the user has logged in via Login.gov, the users will be directed to the Triennial Status Report page. The individual will then enter the required information and e-certify the form. The information CBP collects on the Triennial Status Report is discussed in detail above in this Privacy Impact Assessment.

The license holder is then redirected to pay.gov to submit the payment. The electronic system updates the Automated Commercial Environment with payment information for all records and the mailing and email address for individual license holder records. The Broker Management Officer manually updates the organization address information using a change report provided from the data in the electronic system. A Broker Management Officer may retrieve the triennial report information and review it to ensure the brokers still meet licensing requirements. The electronic report information is housed in the Mobile Collections and Receipts system. CBP will update Appendix B of this Privacy Impact Assessment as additional functions are added to the eCBP broker homepage.