September 15, 2017

Ms. Lisa Soto
Chair, DHS Data Privacy and Integrity Advisory Committee (DPIAC)
c/o Hunton & Williams LLP
200 Park Avenue
New York, NY 10166

Dear Lisa:

One of the Department of Homeland Security's (DHS) core responsibilities is to enforce the immigration laws and policies of the United States. The Department also has a duty to safeguard personally identifiable information (PII) in its possession, and ensure such protections are consistent with the DHS Fair Information Practice Principles (FIPPs). This obligation extends from DHS' mission to safeguard the American people, our homeland, and our values, which includes respect for privacy.

In recent months, the Department launched an Immigration Data Integration Initiative led by the Office of Immigration Statistics in the DHS Office of Policy and the Office of the Chief Information Officer in the DHS Management Directorate. This initiative seeks to establish an integrated immigration data system that will strengthen the Department's ability to analyze the immigration enforcement and immigration benefits lifecycles, and provide real-time access to relevant immigration data needed to support operations, analysis, reporting, and strategic decision-making. This system will also support the Department's ability to disseminate statistics and to permit public access to statistical information that will inform key stakeholders and promote transparency.

For a federal agency to disseminate statistical information, the undertaking requires certain commitments to government-wide data stewardship practices, including the acknowledgement and adherence to the principles and practices of statistical agencies, namely the protection of confidentiality and privacy.

Bearing this in mind, I am requesting that the Committee lend its expertise to the Department to provide advice to the Office of Immigration Statistics to identify best practices for compatible goals of safeguarding privacy and protecting confidentiality for immigration statistics data. Specifically, in the context of the integrated immigration data system, we are asking the Committee to:

- Identify best practices for protecting data linked for statistical purposes, including "crosswalk" files containing identifiers, from both an Information Technology and policy perspectives; and

- Identify data disclosure methods, and whether it is advisable to considerable variable controls for releases to different audiences/mediums. If such controls were utilized, what policy controls should be considered?

If my office can provide any assistance to you as the Committee undertakes this tasking, please do not hesitate to let Sandra Taylor, Christa Jones, or me know.

Very truly yours,

Philip S. Kaplan
Chief Privacy Officer