



**Privacy Impact Assessment
for the
Laboratory Information Network (LIN)**

DHS/CBP/PIA-054

June 14, 2018

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Abstract

The Department of Homeland Security (DHS) U.S. Customs and Border Protection (CBP) Laboratories and Scientific Services Directorate (LSSD) owns and operates the Laboratory Information Network (LIN) system. Laboratory analysts use the LIN web application for tracking and storing information related to analysis requests, test results, and laboratory reports supporting CBP trade and forensic investigations. CBP is conducting this Privacy Impact Assessment because, in addition to material or digital forensic evidence related to a case, LIN case records may include personally identifiable information (PII).

Overview

The Department of Homeland Security (DHS) U.S. Customs and Border Protection (CBP) Laboratories and Scientific Services Directorate (LSSD) provides forensic and scientific analysis for samples collected by CBP officers and agents over the course of their activities as well as investigations. The LSSD mission is to provide rapid, quality scientific and forensic services; and weapons of mass destruction interdiction support to the CBP operational components. LSSD provides scientific/forensic support, including on-site support, to CBP officers and agents and other government agencies to:

- Assist in the investigation and interdiction of weapons of mass destruction;
- Produce timely and effective laboratory reports and crime scene documentation supporting Customs trade compliance and law enforcement missions;
- Provide timely and effective scientific/forensic support to CBP officers and the trade community (i.e., training, targeting, health and safety);
- Approve and/or accredit and monitor commercial gaugers¹ and laboratories that perform measurements and analysis for CBP purposes; and
- Provide scientific/forensic support to other federal agencies, standards writing organizations, foreign governments, and international organizations to promote international trade compliance and more effective international efforts to counter the movement of weapons of mass destruction.

LSSD provides technical advice to the CBP operational community. LSSD provides, in

¹ Commercial gaugers are commercial organizations and individuals who measure, gauger, or sample merchandise. The term “public gaugers” is used to denote a type of commercial gauger dealing mainly with petroleum and petroleum products, such as crude petroleum, as well as alcohol, etc. Commercial gaugers may own and operate commercial laboratories and vice versa. Once a commercial laboratory or commercial gauger is accredited by U.S. Customs and Border Protection (CBP), it may test and/or measure imported commodities on behalf of CBP. Accredited commercial laboratories are commercial organizations and individuals who test merchandise, such as chemicals, textiles, etc. *Source:* CBP INFOCENTER, www.help.cbp.gov.



conjunction with port personnel, consultation on technical issues involving CBP and the importing and exporting community. LSSD also provides support by means of demonstrations or presentations to trade seminars and other business meetings, and by providing technical seminars of interest to the importing and exporting communities at field laboratories or other locations.

Audits and compliance

LSSD conducts audits of outside facilities for accreditation² to perform work under the Customs Modernization Act³ in the following areas: Botanical Identification; Building Stone, Ceramics, Glassware, and Other Mineral Substances; Dairy and Chocolate Products; Essential Oils and Perfumes; Food and Food Products; Inorganic Materials including Inorganic Compounds and Ores; Leather; Metals and Alloys; Organic Materials including Intermediates and Pharmaceuticals; Paper and Paper Products; Petroleum and Petroleum Products; Rubber, Plastics, Polymers, Pigments, and Paints; Spirituous Beverages; Sugar, Sugar Syrups, and Confectionery; and Textiles and related Products including Footwear and Hats.⁴ These audit results are scanned and uploaded into the LIN system.

LSSD also performs technical audits of commercial gaugers and/or laboratories for approval to perform measurements and/or analysis for Customs purposes⁵ upon arrangement with the gauger and/or laboratory.

Locations and specialties

LSSD supports CBP operations in the following areas:

- **Weapons of mass destruction:** services include radiation detection, chemical detection, and identification.
- **Narcotics enforcement:** analytical services with capabilities for chemical and physical testing of all types of commodities, narcotics, and other controlled substances.
- **Trade enforcement:** analyses are performed on imported and exported commodities to determine whether the merchandise is properly described and categorized by the required documentation, or identified as contraband according

² LSSD stores the audit results in LIN; however, all applications for CBP Approved Gaugers and Accredited Laboratories (CBP Form 6478) are stored in a locked cabinet, accessible only by CBP gauger managers and their Division Director. Scanned copies are also saved on the local shared drive with controlled access.

³ Pub. L. 103-182, 107 Stat. 2057, December 8, 1993 (Title VI of the North American Free Trade Agreement Implementation Act).

⁴ The list contains all commodity groups for which accreditation is sought and are listed in 19 CFR § 151.12 – Accreditation of commercial laboratories, section (c).

⁵ Accredited laboratories and gaugers used for Customs purposes are bound by the obligations of 19 CFR §151.12(c) for laboratories and/or 19 CFR §151.13(b) for gaugers.



to its physical and chemical nature.

- **Intellectual Property:** provide a sound technical foundation for Intellectual Property Rights (IPR) enforcement involving copyrights, trademarks, and patents.
- **Finger Printing, and related Digital Forensics:** analysis of latent fingerprints and forensic imaging, and analysis photography.

Regional Laboratories

To accomplish its missions, LSSD has eight regional laboratories, one 24x7 Teleforensics Center, and one Interdiction Technology Branch (ITB) supporting over 200 scientists, chemists, biologists, textile analysts, physicists, forensic scientists, engineers, and procurement specialists. The CBP laboratories vary in their specialties based on location and conduct scientific analysis of a broad spectrum of chemical, biological, and manmade products to ensure compliance with U.S. federal laws. For example, due to the San Francisco laboratory's location on the Pacific Rim, there is an emphasis and greater expertise in that commerce which includes: intellectual property rights (IPR), Digital Millennium Copyright Act (DMCA), antidumping duties on dynamic random access memory semiconductors (DRAMs) (typically from Korea); and textiles, including intermediates of the manufacturing process as well as finished wearing apparel. The Chicago laboratory has the only tensile tester⁶ in the CBP laboratory system capable of determining certain physical characteristics of industrial fasteners, metals, and articles of metal. Because of its northern location, the Chicago laboratory often reviews North American Free Trade Agreement (NAFTA) issues and Canadian merchandise.

The regional laboratories also provide forensic support and analysis to DHS law enforcement investigations. For example, the regional laboratories provide forensic support to CBP officers, the Border Patrol, and U.S. Immigration and Customs Enforcement (ICE) agents such as processing evidence for latent fingerprint and examination; crime scene investigation and evidence collection; analysis of unknown and suspected controlled substances, digital audio and video analysis and duplication, data extraction from multimedia and cellular phones,⁷ and expert witness testimony, among others. Some regional laboratories have advanced forensic capabilities, such as enhancing video and audio recordings for law enforcement customers. This capability includes, audio/video authenticity/continuity, audio/video recovery, audio/video duplication, audio transcription, and audio synchronization. Some regional laboratories also have the capability

⁶ Tensile tests are used to determine how materials will behave under tension load. In a simple tensile test, a sample is typically pulled to its breaking point to determine the ultimate tensile strength of the material.

⁷ For a detailed discussion of CBP's border searches of electronic devices policies and procedures, please see CBP Directive No. 3340-049A: Border Search of Electronic Devices, *available at* <https://www.cbp.gov/document/directives/cbp-directive-no-3340-049a-border-search-electronic-devices> and DHS/CBP/PIA-008 Border Searches of Electronic Devices, *available at* <https://www.dhs.gov/publication/border-searches-electronic-devices>.



of developing standard color and black and white film, generate prints, and making enlargements on a variety of media.

Mobile Laboratories

Most of the regional laboratories also have mobile units to assist CBP officers and agents across the laboratory area of responsibility. For example, the services provided by the Houston Laboratory (Southwest Regional Science Center) support forensic crime scene investigation, WMD interdiction, and trade enforcement. Forensic scientists provide support to DHS law enforcement investigations with the analysis of latent prints, controlled substances, pharmaceuticals, digital evidence, accident investigation, and expert witness testimony. Because of the Center's location to the Southwest border, the mobile units are deployed to provide technical and scientific support to manage, secure, and control the nation's border. Mobile services in this area include the detection of clandestine tunnels, response to case investigations to ensure that physical evidence is identified and collected properly for further forensic examination, and the deployment of weapons of mass destruction detection technologies to the front-line.



Teleforensic Center and Interdiction Technology Branch

The Teleforensics Center responds to radiation alarms and other possible incidents related to weapons of mass destruction at the ports.⁸ The Interdiction Technology Branch⁹ is a team of engineers that supports Non-Intrusive Inspections (NII), which are conducted using large-scale x-ray and gamma-ray imaging systems, radiation detection equipment, small-scale baggage x-ray systems, and portable and hand-held devices.

⁸ The function of the Teleforensics Center (TC) operation is to provide field personnel with reach back access to scientific and technological resources. These resources help facilitate resolutions for field personnel in the performance of their duties. One of the field personnel's primary duties is detection, isolation, and control of potential threats that may result from the presence of chemical, biological, radiological, or nuclear (CBRN) materials. TC scientists provide technical support to resolve threat issues related to the execution of this duty. The TC is staffed 24 hours per day, 7 days per-week. TC scientists' expertise originates from a broad-spectrum of scientific disciplines including chemical, biological, explosives, radiological, and nuclear. TC scientists act in the capacity of technical experts, advisers, and researchers.

⁹ The LSS Interdiction Technology Branch (ITB) consists of general engineers, physical scientists, and project managers that provide CBP with an internal technical capability to ensure that field personnel have the best and most advanced high-technology enforcement equipment available. ITB assists CBP in assessing the "readiness" of equipment proposed for field validation and/or deployment. ITB also acquires and deploys current "off the shelf" equipment for both domestic and international operations. To that end ITB is the technical administrator of all NII procurements and system acquisitions fielded by CBP. ITB advises CBP executive management on high-technology enforcement and inspection technology and technically represents CBP on these issues with other domestic and foreign agencies, Congress, the media, industry, and academia.



Laboratory Information Network (LIN) application

CBP LSSD developed the LIN application to serve as a case management system for tracking and storing information related to analysis requests, test results, and laboratory reports supporting CBP trade and forensic investigations. Only information supporting the collection and analysis of biological, chemical, or man-made substances in the laboratories is processed and stored in LIN. The physical samples are stored offline in access-restricted facilities. Access to the LIN system is restricted to a limited number of authorized LSSD personnel and external (i.e., LSSD customer) groups. All external users are DHS employees and their access must be approved by the LSSD Executive Director and/or the local Laboratory Director.¹⁰ Only LSSD personnel and customers with successful background investigations (BI) are granted access to the LIN application. The external users consist of specific customer groups that are granted access based on approval by the Executive Director of the LSSD. The requests for personnel access to LIN originate with emails from the respective Lab Directors.

CBP uses LIN to manage the intake, process, and results of analysis requests, test results, and laboratory reports supporting CBP trade and forensic investigations. During the initial request and intake process, a requestor (anyone within DHS) sends LSSD test samples with the respective case numbers attached, Chain of Custody Forms¹¹, and an LSSD submission form, which are used to determine the analysis or other specific tasking to be performed. As part of the request for laboratory services, requestors also often submit LSSD-specific forms depending on the type of analysis requested.¹²

Once the case record is created in the LIN system, the laboratory will determine based on the task requirements and/or the laboratory's current capabilities if the laboratory can perform the analysis. If it is determined that the laboratory cannot perform the tasks, the sample can be transferred to another laboratory. If the laboratory can fulfill the request, LIN serves as a case management tool by assigning the testing and analysis to a scientist based on his/her area of expertise.

The analyzing scientist is required to enter the findings in a Narrative field in LIN after he or she completes the testing and analysis of the sample. The Narrative field is a text-based field

¹⁰ The criteria is based on a business need for the external user. If the user needs access to the Trade module to conduct daily workflow or has a need-to-know, the Executive Director will either approve or disapprove the request for external users, and personnel within LSSD will process the request. All Trade customers have a need-to-know about the Entry/Trade samples. They are granted access to Entry/Trade samples only within LIN.

¹¹ See CBP Form 6051D "Detention Notice and Custody Receipt for Detained Property" or CBP Form 6051S "Custody Receipt for Seized Property and Evidence."

¹² Additional forms that often accompany the Chain of Custody documents are the LSSD 280 "Request for Forensic Examination" forms. These forms specifically identify the types of analysis needed (e.g., digital imaging, latent print developing, controlled substance identification). LSSD 280 forms 2, 3, 4 and 5 are required for digital/multimedia evidence.



that allows the analyzing scientist to enter notes as part of the case record. In some cases, an LSSD member enters PII (e.g., FBI Number and individual name) into this text field to help identify a person. To better identify samples and their conditions, PII may be used to make the distinctions from other case records that have similar characteristics. Names and birth dates have been used to identify an individual and to separate case records from one another. However, not all case records include PII in the Narrative field. There are no interfaces from LIN to any internal or external systems. Any PII (i.e., Federal Bureau of Investigation (FBI) Number) captured from another system is manually entered into LIN as needed.

To conclude the case work, the scientist generates a “Sample Report” that includes information in the Narrative field and information such as the description, component, and information requested. Currently, the LSSD laboratories only send their findings to the individual at the U.S. Government agency requesting the analysis. The findings reports may not be sent to government agencies outside of DHS without a formal request being submitted and approved by LSSD and the CBP Privacy Office.

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 maintains information in LIN in accordance with Section 402 of the Homeland Security Act of 2002, as amended, 6 U.S.C. § 202

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

Personal information contained in images and attachments in the system are not searchable by the general user group, and are not retrieved by personal identifier.

Both LSSD staff and customer information can be retrieved by personal identifiers by a restricted group of LSSD management users. This functionality is for administrative use and not for the general user population. LSSD personnel and customer user information for access to LIN is collected pursuant to the DHS/ALL-004 General Information Technology Access Account Records System SORN.¹³

The importer, manufacturer, commodity, and target/subject related information is captured in the system in accordance with the following source system SORNs:

¹³ DHS/ALL-004 General Information Technology Access Account Records System (GITAARS) (November 27, 2012) 77 FR 70792.



1. DHS/CBP-001 Import Information System (IIS)¹⁴ allows DHS/CBP to collect and maintain records on all commercial goods imported into the United States along with carrier, broker, importer, and manifest information.
2. DHS/CBP-011 TECS¹⁵ allows DHS/CBP to track individuals who have violated or are suspected of violating a law or regulation that is enforced/administered by CBP, provide a record of any inspections conducted at the border by CBP, and determine admissibility into the United States.
3. DHS/CBP-023 Border Patrol Enforcement Records (BPER)¹⁶ allows DHS/CBP to identify potential terrorist and criminal activity, immigration violations, and threats to homeland security; to uphold and enforce the law; and to ensure public safety.

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

A System Security Plan for LIN has been completed as part of the 2018 authority to operate (ATO) package. The authority to operate is pending publication of this PIA.

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

CBP retains information collected and maintained by LSSD, including information within LIN, for 20 years after the cutoff date, which occurs at the end of a given fiscal year.¹⁷

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 collection of the personal information maintained in LIN is not covered by the Paperwork Reduction Act, since it is not intentionally solicited from members of the public.

¹⁴ DHS/CBP-001 Import Information System (July 26, 2016) 81 FR 48826.

¹⁵ DHS/CBP-011 TECS (December 19, 2008) 73 FR 77799.

¹⁶ DHS/CBP-023 Border Patrol Enforcement Records (October 20, 2016) 81 FR 72601.

¹⁷ LIN data is covered by Disposition Authority Number is DAA-0568-2015-0005, available at

https://www.archives.gov/files/records-mgmt/rcs/schedules/departments/department-of-homeland-security/rg-0568/daa-0568-2015-0005_sf115.pdf.



Section 2.0 Characterization of the Information

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

While the primary purpose of LIN is to serve as a case management system for LSSD sample testing and analysis, case files and attachments may contain PII from both CBP employees, other agency requestors, and members of the public.

Case Management Processes

As the first step in the sample testing process, LSSD receives testing requests from DHS/CBP component officers/agents via varying modes such as facsimile and verbal and written communications (i.e., memoranda, letters, and email messages). These requests are documented using the form that corresponds to the type of sample and then submitted to LSSD. Once received, an LSSD staff member creates a LIN case record by generating an Electronic Sample Card (ESC or “sample cards”). LSSD staff manually enter information from the requests into LIN to generate the ESC. The original copies of requests submitted to LSSD are stored in a locked cabinet accessible only by the local laboratory management.

An ESC can be created for two types of samples: an Entry/Trade sample and a Non-entry/Non-trade sample.

Entry/Trade Samples

LSSD processes entry/trade samples for analysis as a condition of commercial goods or products entering the United States or in support of requirements consistent with laws governing international trade. Testing of entry/trade samples involves analysis of the chemical makeup of a physical object, and whether the composition of that object has been described accurately by the entity wishing to import the object. This type of testing is typically done in conjunction with, or in support of, the laws or regulations of other government agencies. For example, “trade” testing may be performed on the chemical composition of a pharmaceutical compound in support of the Food and Drug Administration’s (FDA) regulatory authority, or a child’s toy may be tested for lead content in support of the Consumer Product Safety Commission’s (CPSC) authority. The requestors or customers of entry/trade sample testing are components of DHS. They, in turn, are the only parties to receive findings-related information from LIN, as LIN requires “dhs.gov” email addresses for dissemination of test results, ensuring only DHS personnel can receive findings information.

Non-Entry/Non-Trade Samples

The second category of samples, “non-trade,” includes items that require identification for purposes other than importation, which typically includes CBP law enforcement missions. This



category includes items that have been obtained as part of CBP's mission to enforce immigration and drug laws. These types of items may include alleged illegal narcotics, unidentified biological matter (e.g., fingerprints or deoxyribonucleic acid (DNA)), or other non-commercial items obtained from a border crossing or attempted border crossing by persons.¹⁸ Most items in this category are of a non-commercial or non-trade related nature and may contain PII associated with the border crossing of a person.

For Entry/Trade and Non-Entry/Non-Trade case records, the Chain of Custody Forms require similar data. The main difference in information is that Non-Entry/Non-Trade case records require the customer to complete the "Detained From" (*CBP Form 6051D*) field, whereas Entry/Trade case records do not. The Entry/Trade case records also require the completion of *CBP Form 6479 "Laboratory Sample Label,"* which requires only general (non-personal) information. CBP 6479 and DHS 6051 forms both require basic PII from the requestor.

Entry/Trade case records require the following minimum information from CBP Form 6479 (Laboratory Sample Label):

- Requestor information: Name, email, phone number, Import Team number, and port code of the submitting Officer.
- Sample information: Entered Harmonized Tariff Schedule United States (HTSUS) Number, Entry/Line Number, Sample Description, Sampling Reasons,¹⁹ Expedite, Entry Date, Sample Description, Country of Origin, Country of Export, Sample Count, Stated Components, Detained Merchandise, and Protest.
- Request specifics: Information Requested (specifically details what analysis needs to be conducted, if the requestor knows), Expedite (yes/no).

Non-Entry/Non-Trade case records require the following minimum information:

- Requestor information: Name, email, and phone number.
- Sample information: Case ID, Sample Description, Sample Count, Stated Components, and Sample Type.²⁰
- Request specifics: Information Requested, Expedite (yes/no).

¹⁸ Any DNA, fingerprints, or other biometric information that may be part of the chain of custody and possibly linkable to individuals is typically contained in the images and attachments uploaded to LIN as part of the system case records. The actual samples (DNA, fingerprint, etc.) are not stored in LIN as they either disintegrate over time or are disposed of per appropriate agency policies. Any human DNA work is contracted out to accredited private laboratories and processed under close coordination between the LSSD DNA Coordinator and the respective customer agents/officers.

¹⁹ Sampling reasons include "compliance measurement intervention," "trade enforcement," or, "others."

²⁰ Sample type options include Perishable, Non-Perishable, and Not Applicable.



The request forms or other paperwork (see Appendix B) submitted by the customer includes sections for the customer to provide the name of the individual who collected the sample, the conditions present during sampling, and unique sample identification, all of which are attached to the respective sample. LSSD staff use the information provided in the request form to generate a unique sample laboratory report number that is displayed in their sample card. The laboratory report number is a means to identify and track the location of the physical or digital sample as it goes through the LSSD laboratory process.

Image Files

All Chain of Custody and LSSD 280 forms are scanned, uploaded into LIN, and stored as a BLOB – binary large object file. A BLOB image is similar to a digital picture file and cannot be queried manually or with automated scripts in order to extract scanned PII data. Only someone with authorized access to LIN and user rights/permissions to access a specific case record with a BLOB, could access the BLOB file.

LIN User Accounts

LIN user accounts are created using the following data elements, after the LIN manager confirms that the requested user has a completed background investigation:

- Name of User;
- User HashID;²¹
- User phone number;
- User email address;
- User Role (determines the process the user can conduct); and
- Profile Type (determines which pages and buttons the user can access).

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

LSSD receives requests from various customers including from other CBP components (e.g., U.S. Border Patrol, Office of Field Operations), other DHS components (e.g., ICE), the FBI, and other government agencies. DHS law enforcement and trade officials provide information regarding sample testing that is entered into LIN by specialists within LSSD. The requesting information especially for entry/trade sample analysis is provided via CBP Form 6479.

The non-entry/non-trade sample testing information is manually populated to generate the ESC (described above) from the Chain of Custody Forms 6051, in addition to the LSSD 280 forms

²¹ The HashID is a unique identifier assigned to CBP employees derived from a hashed Social Security number.



2, 3, 4 and 5. Any elements of PII associated with these requests are typically contained in these forms which are uploaded into LIN as images/attachments to the respective case records and are not searchable in the system. Any physical samples like fingerprints or DNA either disintegrate or are disposed of per agency policies and no part of physical samples is retained at the LSSD.

Testing request documentation (i.e., requests from customers) is mailed, emailed, or hand delivered to the LSSD and ultimately scanned into LIN by receiving lab personnel.

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

Analysts use commercial sites for information on methods and scientific standards, such as the American Society for Testing and Materials (ASTM) and the Association of Analytical Communities (AOAC) International. None of these external sites, however, are used to determine the final HTSUS designations. After the testing analysis is completed by LSSD personnel, they can only suggest a change in the HTSUS designation. It is then up to the relevant parties in CBP to make the final HTSUS determinations.

Additionally, CBP-approved gaugers²² and accredited laboratories are used to provide expertise and information primarily on measurement and sampling of bulk commodities to the CBP laboratories.

2.4 Discuss how accuracy of the data is ensured.

Test samples are received, physically reviewed, and findings-related information is entered into LIN. The LIN input screens contain various data input validation formats to ensure accuracy of data. In addition, information (i.e., supporting documentation for entry/trade sample testing) is manually entered from CBP Form 6479. These testing requests are assigned to the Branch Chief who, in turn, assigns them to laboratory analysts. After the laboratory analysts complete their analyses, technical and administrator reviews are performed. Once final reviews are approved by management (i.e., Lab Directors, Assistant Lab Directors), sample test reports are published and emailed to the respective DHS customers.

If necessary or when discrepancies are identified, analysts verify information by contacting the requesting DHS component. Each laboratory uses the LSSD National Quality Standards to

²² “Commercial gaugers” are individuals and commercial organizations that measure, gauge, or sample merchandise (usually merchandise in bulk form) and who deal mainly with animal and vegetable oils, petroleum, petroleum products, and bulk chemicals. A “Customs-approved gauger” is a commercial concern, within the United States, that has demonstrated, to the satisfaction of the Executive Director (defined at § 151.12(a)), pursuant to this section, the capability to perform certain gauging and measurement procedures for certain commodities. Customs approval extends only to the performance of such functions as are vested in, or delegated to, Customs. 19 CFR § 151.13(a).



ensure data accuracy and security of chain of custody. The accuracy and correctness of all samples are reviewed and approved via technical and administrative reviews.

2.5 Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: There is risk that inaccurate data could be stored in the LIN system due the manual entry of information from the original requests.

Mitigation: This risk is partially mitigated due the multiple levels of quality control(s) and supervisory reviews within LSSD and LIN. The LIN database has various data validation formats to ensure that the proper types of information are included in the correct fields (e.g., a date field has to conform to a date format). However, due to the manual data entry from the intake forms, there is a risk of data entry error.

Because information processed by LSSD and recorded in LIN may be used for prosecution or submitted as evidence during a court hearing, LSSD personnel have a strong incentive to ensure any data entered manually is correct. LSSD personnel are trained regarding chain of custody and basic rules of evidence requirements to ensure that all samples, testing, and LIN case management information have the highest data fidelity to withstand judicial scrutiny.

There is currently no input validation capability in place to prohibit the Narrative field from accepting PII information; however, the LIN Data Input Standard Operating Procedure (SOP) directs the laboratories to exclude information that can directly identify an individual.

Privacy Risk: There is an over collection risk because LIN contains scanned documents that might not be directly necessary for the testing and analysis purpose the system services.

Mitigation: This risk is mitigated. Mandatory documents (i.e., Chain of Custody and LSS 280) are scanned and uploaded into LIN for all forensic cases. Other documents associated with the sample case are necessary to support the sample case as evidence in court. If a document is missing, this could call the integrity of the sample and the process into question and make the sample inadmissible. However, to ensure data minimization where possible, during request intake LSSD personnel review the submission to determine if the attached documents are necessary for the requested analysis. If it is deemed necessary, the documents will be uploaded into LIN. If not, they will not be uploaded into LIN but returned to the submitter or a copies retained in the secured case file.



Section 3.0 Uses of the Information

3.1 Describe how and why the project uses the information.

LIN is used to store and track requests and capture information related to sample processing, analysis, and any results. A report is created based on results of sample analysis testing and submitted to the requesting customer. LIN allows laboratory personnel to store, track, and query samples as it passes through the testing process. It also allows these users to record the results of the analysis that is relayed to the customers. During the analysis phase, there may be external information (i.e., FBI Number) that is manually entered into LIN as part of the findings that are ultimately conveyed to the requesting customer.

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.

LIN does not use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly.

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

LSSD employees are the only users who process sample testing information in LIN. However, Trade users from various DHS components have a Trade module in LIN that allows querying of their Entry/Trade sample reports. These Trade users have their own login credentials to the module for viewing (read-only) of their sample testing requests.

Additionally, users (e.g., the Office of Professional Responsibility (OPR)) that provide OPR cases to LSSD are given access in LIN to search information submitted by their offices. Their role is a limited access role in LIN for querying of their cases. With their role and profile, these customers have restricted views limited to their data only. They cannot modify their data and typically filter data by fields such as the randomly generated LIN ID, requested data, and submitter last name. These customer groups are provided access to LIN by the LSSD Executive Director and respective Lab Directors.

3.4 Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: There is the potential risk of unauthorized access, use, or disclosure of PII and case record data from the LIN system.



Mitigation: All LIN data is protected by the technical, operational, and management security controls identified, defined, and implemented using NIST²³ 800-53 Revision 4 and DHS 4300A directives and guidelines. Compliance with these controls is monitored and enforced by a full-time Information System Security Officer (ISSO) and governed by DHS and CBP policies. All LIN security controls are tracked and monitored in the official System Security Plan (SSP) developed by the ISSO.

LIN employs user controls that limit the access and functions that individual users may perform within LIN. Non-LSSD (i.e., OPR and Trade users) users can only access their individual cases and results throughout the system and cannot modify system data. Only supervisors and administrators can see complete cases and documentation, which is not typically accessible to general users (or non-management personnel).

Furthermore, all persons working in LSSD must pass a full background investigation (BI) conducted by CBP. All LSSD personnel must also sign a non-disclosure agreement (NDA) and the “LIN Rules of Behavior” agreement, and pass the “CBP IT Security Awareness and Rules of Behavior” training prior to being granted access to LIN.

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.

There is no direct notice to individuals that is provided by LSSD prior to collection and storage of information during the testing process. LSSD is never the initiator of sample analysis (or any supporting documentation) but typically the recipient of testing requests. No PII is intentionally solicited from the public and sample testing is only done upon receipt of requests and supporting documentation from other CBP and DHS components.

For the trade/entry analysis, importers are aware through public-facing documents like the SORNs listed below that their items are subject to inspection and analysis by federal authorities. The CBP website, Privacy Act Statements on relevant trade forms, and various published privacy documentation provide notice of these activities.

While the identities of the subjects of certain forensic or non-entry/non-trade sample requests may be contained in the chain of custody and LSSD 280 forms, such information is not entered into LIN by lab personnel. LSSD personnel have no interaction with the subjects of

²³ See Nat'l Inst. of Standards and Tech., Recommended Security Controls for Federal Information Systems and Organizations (2009).



collection and only work with evidence/samples collected by their customer entities. The request forms are typically scanned into LIN and stored as BLOB images.

CBP System of Records Notices (SORNs) provide notice regarding various data elements collected by CBP in order to support its mission. These SORNs include:

1. DHS/CBP-001 Import Information System (IIS)²⁴ allows DHS/CBP to collect and maintain records on all commercial goods imported into the United States along with carrier, broker, importer, and manifest information.
2. DHS/CBP-011 TECS²⁵ allows DHS/CBP to track individuals who have violated or are suspected of violating a law or regulation that is enforced/administered by CBP, provide a record of any inspections conducted at the border by CBP, and determine admissibility into the United States.
3. DHS/CBP-023 Border Patrol Enforcement Records (BPER)²⁶ allows DHS/CBP to identify potential terrorist and criminal activity, immigration violations, and threats to homeland security; to uphold and enforce the law; and to ensure public safety.

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

With non-entry/non-trade samples, there is no opportunity for individuals to consent or opt out of collection since forensic/biometric evidence is typically obtained during law enforcement encounters/incidents. During the analysis phase, these samples are not linked to individuals, but rather only to the LIN Case ID for processing. Any PII in the system is only collected as needed during the analysis phase and entered in the Narrative field if needed to disseminate as part of the findings report to the customers. Any consent or opt-out by individuals would be done with the customer law enforcement entities collecting the information (i.e., at points of collection).

However, with entry/trade samples, importers are expected to understand the various trade regulations especially as they relate to providing personal information to effect importation of goods. If they decline or opt-out of providing their information, it may impact their ability to import goods into the United States.

4.3 Privacy Impact Analysis: Related to Notice

Privacy Risk: There may be insufficient notice and communication to the individuals whose information is maintained by CBP in relation to non-trade (or forensics related) sample testing.

²⁴ DHS/CBP-001 Import Information System (July 26, 2016) 81 FR 48826.

²⁵ DHS/CBP-011 TECS (December 19, 2008) 73 FR 77799.

²⁶ DHS/CBP-023 Border Patrol Enforcement Records (October 20, 2016) 81 FR 72601.



Mitigation: This risk is partially mitigated through the publication of this PIA, which informs the public that information may be housed in LIN in support of laboratory testing. In some instances, the subject may interact directly with CBP and either voluntarily provide information, or be aware of CBP's collection of information, including any samples. However, there remains some risk that individuals may not be aware that their information is maintained by CBP. In some cases, requiring notice and consent would interfere with a law enforcement investigation and is not operationally feasible; CBP's publication of this PIA and the relevant SORNs provides generic notice to cover this collection.

Section 5.0 Data Retention by the project

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

Due to potential court cases or congressional inquiries, data is retained in LIN to facilitate access for law enforcement and other requests. The information in LIN can be generated as hard copy or physical records for cases. Per the records disposition schedule identified above, documentation related to samples is kept for 20 years after cutoff, which occurs at the end of a fiscal year. There is no archiving in the database due to the need for quick turnaround on information requests. Individual labs that require space to store physical records may use the General Services Administration (GSA) Records Center.

5.2 Privacy Impact Analysis: Related to Retention

Privacy Risk: There is risk that information may be retained in LIN for longer than necessary.

Mitigation: There is no risk to data retention. No data is archived in the system given the need for expedient retrieval for investigation purposes. The data contained in the system goes through the formal daily and incremental back-up processes to ensure the integrity and availability of the data. If space becomes an issue due to retention of data, individual labs can use the services of the GSA Records Center for storage. There are automated and manual controls in LIN to ensure compliance with the appropriate records disposition schedule.



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.

There is an information sharing memorandum of understanding (MOU) in place with the Drug Enforcement Agency (DEA) to share drug analysis results with the DEA's National Forensics Laboratory Information System (NFLIS). The data is used to create a comprehensive picture in support of strategic drug control plans and policies. The DEA does not have direct access to LIN and receives the data in regular reports sent by CBP. The data does not generally include any personally identifiable information.

The data provided to the DEA includes:

- Laboratory case number;
- Laboratory item number;
- Submission date;
- Location of the submitting agency;
- Form of material;
- Quantity;
- Completion Date; and
- Controlled substance(s) identified.

Any additional sharing of personally identifiable information with law enforcement and agencies outside of DHS must be authorized by the CBP Privacy Office upon review of the individual requests.

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

The sharing described above is compatible with the original law enforcement related purposes for which the information was collected. While analytical data in LIN is not retrievable by personal identifier, the TECS, BPER, and IIS SORNs allow for CBP to collect information in support of its border security and trade enforcement missions. Sharing of statistical data with DEA for drug enforcement aligns with CBP's original collection for law enforcement purposes.



6.3 Does the project place limitations on re-dissemination?

Yes. There are limitations placed on re-dissemination of lab records (i.e., findings reports). LSSD understands that any requests for lab findings reports to be shared outside of CBP need to be authorized by the CBP Privacy Office. The release authorization memoranda specify exact sharing partners for the respective lab records. Any additional sharing needs to be reviewed and authorized by the CBP Privacy Office with follow up memoranda issued to the requesting entities.

Additionally, LSSD has a legal disclaimer that is placed on the bottom of all of its laboratory findings reports disseminated to customers.

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

The e-mail or hard copy request for records is maintained in the CBP Tracking 2.0 system as supporting documentation from the requesting organization.²⁷ When an external organization requests information from LIN, they must provide a justification for why they need it. When an outside organization requests information, that information is provided via email or hard copy to the requesting official, upon approval from the LSSD Executive Director. Third party disclosure of information elements of PII must be approved by the LSSD Executive Director.

Additionally, any requests for lab reports from outside of DHS need to be reviewed and authorized by the CBP Privacy Office. Only when the CBP Privacy Office issues the release authorization memorandum can LSSD release information to external parties. The authorization memorandum specifies the data to be released and the specific parties to receive said information from CBP. Finally, the release authorizations from CBP Privacy require the completion of the DHS Form 191 Privacy Act Disclosure Record to document each instance of information sharing.

6.5 Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk that information elements of PII may be inappropriately shared with external organizations without a demonstrated need-to-know.

Mitigation: Risks related to the sharing of information outside DHS are mitigated through arrangements such as MOUs and release authorizations from the CBP Privacy Office governing the sharing of LIN data with external parties. Any information shared outside DHS on a regular basis is tracked using an MOU and/or authorization from the CBP Privacy Officer, Office of Chief Counsel (OCC), and DHS headquarters, as needed. Additionally, any release authorizations from

²⁷ CBP Tracking 2.0 is a multi-tier, web-based case management system that all CBP headquarters (HQ) offices use to track document and data requests through case completion. The correspondence includes congressional responses, official rulings, policy statements, and complaints and testimony received from the public, other government agencies and the private sector.



CBP Privacy require the completion of the DHS Form 191 Privacy Act Disclosure Record to document the sharing.

Section 7.0 Redress

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

Individuals may request information contained in LIN by submitting requests for access to CBP's Freedom of Information Act (FOIA) Office via FOIA online,²⁸ or by mailing a request to:

U.S. Customs and Border Protection (CBP)
Freedom of Information Act (FOIA) Division
1300 Pennsylvania Avenue NW, Room 3.3D
Washington, D.C. 20229

All FOIA requests must be in writing and include the requestor's daytime phone number, email address, and as much information as possible of the subject matter to expedite the search process.

All Privacy Act or FOIA requests for information in LIN are submitted to LSSD for processing. Any data obtained from LIN in response to a FOIA request is manually retrieved and redacted. Information that is determined to be of law enforcement or national security importance may exempt from release under FOIA.

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

LIN reviews individual access requests to correct inaccurate or erroneous information on a case by case basis. The DHS customer provides the information that is entered into LIN for analysis, test results, and laboratory reports. LIN has no direct interaction with individuals who are associated with the samples that are collected for analysis.

Individuals seeking notification of, and access to, any record with information elements of PII contained in LIN or seeking to contest its content, may gain access to certain information about themselves by filing a FOIA or Privacy Act request with CBP at <https://foia.cbp.gov/palMain.aspx>, or by mailing a request to:

U.S. Customs and Border Protection (CBP)
Freedom of Information Act (FOIA) Division
1300 Pennsylvania Avenue NW, Room 3.3D
Washington, D.C. 20229

²⁸ <https://foia.cbp.gov/palMain.aspx>.



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

Through the publication of this PIA, individuals seeking notification of and access to any record contained in LIN are informed that they may submit a request through the procedures and contact information documented in section 7.2 above. If an individual believes that CBP actions are the result of incorrect or inaccurate information by law enforcement, then inquiries should be directed to the Customer Service Center, at the following address or via www.help.cbp.gov:

Customer Service Center
OPA - CSC - Rosslyn
U.S. Customs and Border Protection
1300 Pennsylvania Avenue, NW
Washington, DC 20229

The Customer Service Center will respond in writing to each inquiry.

7.4 Privacy Impact Analysis: Related to Redress

Privacy Risk: There is a risk that inaccurate or inadvertent PII collected by an inspecting CBP officer at the port of entry may subsequently be stored in LIN, and that the existing redress procedures would not allow for the information to be corrected.

Mitigation: Any information that may contain PII is entered into LIN through the intake forms upload process. The hardcopy 'Chain of Custody' (DHS 6051D or S) and LSSD 280 forms are received at the time of arrival of the samples to be tested. Upon scanning of these documents, the resulting PDF files are uploaded into the respective records in LIN. The risk that LSSD employees may inaccurately enter information into the system is minimal, since whatever is written on the chain of custody documentation is what is scanned and uploaded into LIN. The chain of custody information is ascertained in the field by the respective agents or obtained directly from source systems. LSSD has no interaction with individuals and does not collect any personal information directly. The business purpose for information in LIN is to complete appropriate sample testing and analyses.

Any individual wishing to access any LIN record or seeking to contest its content, may submit a FOIA or Privacy Act request in writing to:

U.S. Customs and Border Protection (CBP)
Freedom of Information Act (FOIA) Division
1300 Pennsylvania Avenue NW, Room 3.3D
Washington, DC 20229



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?

The handling of information in LIN is governed by the Quality Manual Procedures established by LSSD. Only authorized users have the ability to extract materials from LIN. Activities of these users are audited on a quarterly basis by the ISSO. In addition, during these audits, LIN System Administrator performs reviews of login and usage records. Daily reports are reviewed to ensure only authorized users are accessing the system.

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

All CBP personnel and contractors complete the annual mandatory privacy and security awareness training. LSSD laboratory employees are provided guidance from the National Quality Manual, which contains the procedures on how to handle information being submitted for analysis. Each laboratory follows specific LSSD procedures as to how to process samples and handle supporting evidence.

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

Direct access to LIN is strictly controlled by supervisors and the LIN Manager. The system restricts a user's access and rights depending on his/her needs in LIN based upon his/her job responsibilities. The application uses defined user roles and profiles to enforce the access control policies. All administrative account access is requested in writing to the System Owner who then vets those requests with the users' supervisor. All other users have limited privileges to only access, edit, or change samples within their assigned laboratory. Access control is enforced through role-based permissions assigned to LIN users. The system restricts access to privileged functions and security-relevant information to explicitly authorized personnel by only assigning privileged rights to appropriate LIN accounts. These privileges can only be assigned by a LIN Manager with the authorization from the LIN System Owner. The system maintains a log of user activities for auditing purposes. These logs are reviewed on a daily basis by the Information System Security Officer (ISSO) and to ensure user list and permissions are up to date (e.g., removing user access in a timely manner).



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?

The current MOU between CBP and DEA only specifies non-personal information sharing, so no personal information is shared. This MOU is reviewed by the program management, CBP Privacy Officer, the Office of Chief Counsel, and then sent to DHS for formal review. In the event of future changes concerning information in LIN, new users of LIN, or intended uses of the information collected and maintained in the system, LSSD would engage the CBP Privacy Office to discuss the intended expanded users or uses of the information and update the relevant privacy compliance documentation (including this PIA) as appropriate. All information shared within DHS is approved by the System Owner.

Responsible Officials

Dave Fluty
Executive Director
Laboratories and Scientific Services Directorate
U.S. Customs and Border Protection

Debra L. Danisek
CBP Privacy Officer
U.S. Customs and Border Protection

Approval Signature

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

Philip S. Kaplan
Chief Privacy Officer
Department of Homeland Security



Appendix A: Data Elements Stored in the Laboratory Information Network System

The information collected for entry/trade sample analysis in LIN via CBP Form 6479 is as follows (elements that are uploaded into LIN are denoted with an asterisk):

- Name of Submitting Officer*
- Team Number*
- Email of Submitting Officer*
- Phone Number*
- Entry Number/Line No*
- Line Item Number
- Line Item Value (\$)
- Entered Harmonized Tariff Schedule of the United States (HTSUS)²⁹ Number*
- Port Code*
- Entry Date*
- Country of Origin*
- Country of Export*
- Importer Name or Number*
- Manufacturer Name or Number*
- Sample Description*
- Sample Item Count*
- Sent to Lab Date
- Stated Components*
- Information Requested*

²⁹ The USITC (Office of Tariff Affairs and Trade Agreements) is responsible for publishing the Harmonized Tariff Schedule of the United States Annotated (HTSA). The HTSA provides the applicable tariff rates and statistical categories for all merchandise imported into the United States; it is based on the international Harmonized System, the global system of nomenclature that is used to describe most world trade in goods. Although the USITC publishes and maintains the HTSA in its various forms, Customs and Border Protection is the only agency that can provide legally binding advice or rulings on classification of imports. See <https://www.usitc.gov/tata/hts/index.htm>.



- Sampling Reasons (Classification, Trade Enforcement, Compliance Measurement Interventions, Other Reason (Explain))*
- Protest (If checked, enter protest number)*
- Detained Merchandise?*
- Expedite*

The information collected from the Chain of Custody DHS Form 6051D is as follows:

- Held for other agency? Yes or No. If Yes, Name of Agency.
- Certified Mail No.
- Investigative Case No.*
- General Order No.
- Exodus Command Center Notified?
- Port Code
- Date of Detention
- Time
- Entry Number
- Detained from (Name, Address, Telephone No.)
- Seal or Other ID No.
- Miscellaneous Nos.
- Remarks
- Fines, Penalties, and Forfeitures Numbers (FPF No.*)
- Point of Contact Information
- Additional Information from Importer/Exporter/Subject
- Reason for Detention
- Tests or Inquiries to be Conducted
- Property (Line Item No., Description, Packages, Measurement, Est. Dom. Value, Samples Sent to DHS Lab/Date)



- Detaining Officer Name (Name, Signature, Date)*
- Acceptance/Chain of Custody (Line Item No., Description, Name/Title/Organization, Signature, Date)

The information requested on the Chain of Custody DHS Form 6051S is as follows:

- FPF No.*
- Incident No.
- Investigative Case No.*
- Enforce No.
- Prior Detention?
- Date Seized
- Time Seized
- Federal Drug Identification Number/Misc. (FDIN/Misc.)
- Seized From (Name, Address, Telephone Number)
- Entry No.
- Seal or Other ID Nos.
- Remarks
- Send Correspondence to
- Property (Line Item No., Description, Packages, Measurement, Est. Dom. Value)
- Seizing Officer (Name, Signature, Date)
- Acceptance/Chain of Custody (Line Item No., Description, Name/Title/Organization, Signature, Date)

The information collected for forensic examination in LIN via DHS Form 280 is as follows:

- Submitted by*
- Title*
- Agency*



- Station/Sector/Office
- Contact information (Phone/Mobile/Email)*
- Mailing Address
- Submission Date
- Evidence Return Address
- Investigation Case No.*
- Chain of Custody No.*
- Search Warrant or Consent to Search
- Court Date
- Has this case been submitted to LSSD before? If yes, provide LSSD Report Number
- Charge/Type of investigation
- Case Summary
- Latent prints (prints are submitted to LSSD for comparison to known identities or determination of aliases by searching Next Generation Identification (NGI)³⁰ and Automated Biometric Identification System (IDENT)³¹)
- Process
- Exam
- NGISearch (FBI)
- Office of Biometric Identify Management (OBIM)/IDENT Search (DHS)
- Controlled Substance
- Total Seizure
- Subsample
- DNA - LSSD works with the requestors and assists with the submission of this evidence to either the Federal Bureau of Investigation or the current DNA contractor for testing purposes.

³⁰ Department of Justice (DOJ) Next Generation Identification (NGI) system is an electronic repository of biometric and criminal history information. Source: <https://www.fbi.gov/services/cjis/fingerprints-and-other-biometrics/ngi>.

³¹ Automated Biometric Identification System (IDENT) – the DHS system for storage and processing of biometric and associated biographic information. Source: <https://www.dhs.gov/biometrics>.



- Audio/Video – video/audio is submitted for enhancement, noise subtraction, stills, etc. No electronic/digital files are attached in LIN.
- Dubbing
- Authentication
- Enhancement
- Other (specify)
- Film Development
- Digital Evidence - electronic devices (phone/GPS/hard drives/flash drives) are submitted for extraction or analysis of data. No evidence is retained by LSSD or attached in LIN.
- Hard Drive
- Flash Memory
- Cell Phone
- SIM Card
- GPS
- Other (specify)
- Remarks/Special Instructions
- Description of Item Submitted for Examination*
- Examination Requested*



Appendix B: Documents/Forms that may Accompany Samples

Below is a list of documents that sometimes accompany sample requests that are stored in a sample case record.

Trade –

- Invoices
- Packing lists
- Manifest sheets
- Waybills
- Heat sheets
- Confidential information concerning the manufacturing process
- CBP Form 7501: Entry Summary³²
- CBP Form 3461: Entry/Immediate Delivery for Automated Commercial Environment (ACE)^{33, 34}
- CBP Form 29: Notice of Action³⁵

Forensic –

- Department of Motor Vehicle (DMV) records
- I-205 (Warrant of Removal/Deportation)
- I-213 (Record of Deportable/Inadmissible Alien)
- I-221 (Order to Show Cause and Notice of Hearing)
- I-291 (Application to Register Permanent Residence or Adjust Status)
- I-294 (Warning to Alien Ordered Removed or Deported)
- I-296 (Notice to Alien Ordered Excluded by Immigration Judge)
- I-871 (Notice of Intent/Decision to Reinstate Prior Order)

³² <https://www.cbp.gov/trade/programs-administration/entry-summary/cbp-form-7501>.

^{33,33} <https://www.cbp.gov/document/forms/form-3461-entryimmediate-delivery-ace>.

³⁴ See DHS/CBP/PIA-003 Automated Commercial Environment (ACE), available at <https://www.dhs.gov/sites/default/files/publications/privacy-pia-cbp003-ace-march2018.pdf>.

³⁵ Pursuant to 19 CFR 152.2.



- Fingerprint 10-Print Cards – name, FBI Number, date of birth (DOB), fingerprints
- DHS fingerprint cards³⁶ – name, DOB, Employer Identification Number (EIN), Fingerprint Identification Number (FIN), fingerprints
- FD-249 (Arrest and Institution Fingerprint Form)³⁷
- FD-258 (Applicant Fingerprint Form)³⁸

³⁶ The Office of Biometric Identity Management (OBIM) supports the Department of Homeland Security's responsibility to protect the nation by providing biometric identification services that help federal, state, and local government decision makers accurately identify the people they encounter and determine whether those people pose a risk to the United States. OBIM supplies the technology for collecting and storing biometric data, provides analysis, updates its watchlist, and ensures the integrity of the data. OBIM was created in March, 2013, replacing the United States Visitor and Immigration Status Indicator Technology (US-VISIT) Program.

³⁷ This file card (red) is used for criminal submissions to the FBI available at <https://www.fbi.gov/file-repository/fd-249.pdf/view>.

³⁸ This file card (blue) is used for civil submissions to the FBI pertaining to individuals applying for criminal justice positions available at <https://www.fbi.gov/file-repository/standard-fingerprint-form-fd-258-1.pdf/view>.