



Privacy Impact Assessment  
for the

# **Imaged Documents and Exemplars Library**

**DHS/ICE/PIA-035**

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## **Abstract**

The U.S. Immigration and Customs Enforcement (ICE) Homeland Security Investigations-Forensic Laboratory (HSI-FL) owns and operates the Imaged Documents and Exemplars Library (IDEAL), a centralized repository of images of and document characteristics from travel and identity documents, as well as reference materials concerning attempts to counterfeit or tamper with those documents. IDEAL is used to support the HSI-FL's mission to conduct forensic document analysis in support of law enforcement investigations and activities by the U.S. Department of Homeland Security (DHS) and other agencies. IDEAL assists HSI-FL employees in locating, verifying, and storing documents in the HSI-FL Library. ICE conducted this Privacy Impact Assessment (PIA) because personally identifiable information (PII) of individuals is often captured in the images and other records maintained in IDEAL.

## **Overview**

The HSI-FL is an accredited crime laboratory located within ICE's Office of Homeland Security Investigations (HSI) that provides a broad range of forensic, intelligence, and investigative support services for ICE, DHS, and many other U.S. and foreign law enforcement agencies. Created in 1978 under the U.S. Department of Justice, Immigration and Naturalization Service, the HSI-FL became part of DHS on March 1, 2003, as part of the federal government's response to the 9/11 attacks. The HSI-FL specializes in the scientific authentication; forensic examination; research, analysis, and training related to travel and identity documents; latent and patent finger and palm prints; and audio and video files in support of law enforcement investigations and activities by DHS and other agencies. To facilitate forensic examinations and for use in forensic document training, research, and analysis, the HSI-FL maintains case files, a case management system, an electronic library of travel and identity documents (IDEAL), and a hard copy library referred to as the HSI-FL Library.

As a crime laboratory specializing in the forensic examinations and research of travel and identity documents, the HSI-FL attempts to determine the authenticity, authorship, and any actual or potential alterations of travel and identity documents. Examinations of such documents submitted by DHS and other U.S. and foreign law enforcement agencies and international organizations normally begin with a physical (naked eye, tactile) inspection and proceed to microscopic, instrumental, and comparative examinations, as necessary and appropriate. Depending on the document type, these examinations also may require the expert analyses of handwriting, hand printing, typewriting, printing processes, papers, inks, and stamp impressions. HSI-FL examinations are predominantly performed on documents used to establish identity or



facilitate travel, such as passports, visas, identification cards, and border crossing cards,<sup>1</sup> but can be performed on virtually any document, including envelopes, handwritten documents, letters, vital records, and typewritten documents. DHS and other federal, state, and international government agencies or organizations, such as the United Nations, may submit requests to HSI-FL for document authentication. In response, the HSI-FL may conduct an analysis and share the results of forensic examinations within DHS and externally with other government agencies and international organizations in the course of law enforcement investigations and for admission into evidence in judicial proceedings.

### *HSI-FL Library and IDEAL*

The IDEAL database and the HSI-FL Library contain two categories of records: (1) travel and identity documents (hereafter, “documents”) and (2) reference materials used to help in the forensic analysis of travel and identity documents. The HSI-FL maintains the documents and reference materials in both hard copy and electronic format for use in comparative forensic examination and fraudulent document training, research, and analysis. The hard copies are maintained in the HSI-FL Library while the electronic copies are stored in IDEAL.

IDEAL contains electronic images and document characteristics for all documents and reference materials stored in the HSI-FL Library and allows HSI-FL employees to access these electronic images and document characteristics from their own workstations. Further, IDEAL provides inventory control of the hard copy material in the HSI-FL Library, which includes the support of “checking out” hard copy documents and reference materials in the HSI-FL Library by HSI-FL employees. Thus, IDEAL is the electronic counterpart to the HSI-FL Library and also serves as the “card catalogue” for the HSI-FL Library, and assists HSI-FL employees in locating, verifying, and storing documents in the HSI-FL Library. IDEAL does not serve as a case management system for the HSI-FL and none of the results of HSI-FL examinations are stored in IDEAL.

IDEAL indexes and assigns to all documents added to the HSI-FL Library an IDEAL identification number (IDEAL ID Number) and bar code, thus providing a standard identification and tracking mechanism and permitting indexing. The IDEAL ID Number is system-generated and allows documents to be quickly located in IDEAL. The bar code number links the images maintained in IDEAL to hardcopies maintained in the HSI-FL Library.

The HSI-FL collects and maintains genuine, altered, and counterfeit documents in hard copy format from international organizations, government agencies, and law enforcement organizations from across the United States and around the world to research methods of document

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<sup>1</sup> The HSI-FL may also perform examinations on fingerprints or virtually any other kind of document, including envelopes, handwritten documents, letters, vital records, and typewritten documents. The HSI-FL does not use IDEAL to track or store fingerprints or these other types of documents.



production and authenticate questionable documents through comparative forensic examinations. These travel and identity documents include documents such as passports, identification cards, birth certificates, stamps, visas, and any other document that can be used to establish nationality or identity from any country including the United States.

From these same sources, the HSI-FL also collects information that helps with the identification of potential counterfeit characteristics, potential fraud, security features, and other information valuable to forensic analysis (hereafter, “reference materials”). HSI-FL employees also make use of reference materials issued by the United States and other nations that contain useful information such as descriptions of security features of travel and identity documents, or information concerning attempts to counterfeit or alter such documents.

Document characteristics are manually entered into IDEAL to catalogue, track, and facilitate searching for documents and reference materials. Depending on the particular document, the document characteristics entered into IDEAL may include the document type, document number (*e.g.*, passport number, driver’s license number, state identification number), country of origin, region, authenticity of the document, information regarding the location and availability of the hard copy document in the HSI-FL Library, and a short description of the document.<sup>2</sup> Further, Social Security Numbers (SSN) are not directly entered into IDEAL; instead, the serial number on the back of the document is entered into the system. With the exception of document numbers, PII is neither manually entered into IDEAL nor searchable. In addition to manually entered information, the document is scanned into IDEAL capturing and storing additional information, including PII. The PII stored on the images is view only and may not be searched or used in any other manner in IDEAL.

### *Types of Documents Maintained by IDEAL*

The HSI-FL divides the documents in IDEAL and the HSI-FL Library into five different categories: (1) genuine standard documents; (2) verified documents; (3) unverified documents; (4) counterfeit documents; and (5) altered documents.

The first category, *genuine standard documents*, is comprised of documents never used in circulation and officially submitted to the HSI-FL by a valid issuing authority or other officially recognized domestic or foreign agency. Valid issuing authorities produce genuine standard documents as samples of particular travel and identity documents (*e.g.*, passports) and include all of the same characteristics and security features of that document. Genuine standard documents are usually issued under an obviously fictitious name, such as “Happy Traveler,” to ensure they are easily identified as samples. Genuine standard documents do not contain the PII of actual individuals; however, they may contain photographs of individuals who have consented for their

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<sup>2</sup> Certain documents contained in IDEAL, such as images of admission stamps, do not contain document numbers. These documents will not have a document number entered into IDEAL.



images to be used and distributed on these sample documents. The HSI-FL uses genuine standard documents during forensic analysis to authenticate other travel and identity documents purporting to have been issued by the same issuing authority. This authentication is used to support law enforcement investigations in response to government agency inquiries from the United States and around the world and judicial proceedings.<sup>3</sup>

The remaining four categories of documents are provided to the HSI-FL by the valid issuing authority of a domestic or foreign agency, or from other sources including international organizations; DHS; the U.S. Department of State (DOS); and other federal, state, and foreign government agencies and law enforcement organizations. These four categories of documents may be directly provided for inclusion in the HSI-FL Library or may be initially provided for other purposes such as forensic examination and then retained by the HSI-FL, with the submitting agency's permission, after the examination is complete. The HSI-FL determines whether to include specific documents in the HSI-FL Library based upon the HSI-FL Library's need for that document, particularly whether the HSI-FL Library currently has a document of that type already in the HSI-FL Library. These categories of documents may contain the PII of individuals.

- *Verified documents* are those documents found to conform to comparable genuine travel and identity documents. These documents are provided to the HSI-FL by international organizations, government agencies, and law enforcement organizations from across the United States and around the world. These documents may be provided by other government agencies as authentic documents or as documents of unknown authenticity that the HSI-FL later authenticates during forensic analysis. As verified documents are authentic travel and identity documents, they contain the PII of the individuals to whom they were issued.
- *Unverified documents* are those that the HSI-FL has analyzed and has not conclusively determined are verified, counterfeit, or altered. These are often documents that were used in circulation by individuals. As these documents are believed to be travel and identity documents used in circulation, they may contain the PII of individuals to whom they were issued.
- *Counterfeit documents* are those that the HSI-FL has determined through forensic analysis are not authentic documents issued by a foreign or domestic governmental issuing authority. Counterfeit documents include: (a) documents created to imitate authentic documents from legitimate issuing authorities; (b) documents created when the purported issuing authority does not issue a document of that particular type; and (c) documents created where the purported issuing authority does not exist. Counterfeit

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<sup>3</sup> For example, government agency inquiries could include a U.S. Citizenship and Immigration Services request for the authentication of a travel and identity document prior to granting immigration benefits.



documents may contain the PII of real individuals or fictitious identities created by the counterfeiter.

- *Altered documents* are documents that were originally authentic documents issued by a foreign or domestic governmental issuing authority that have been changed in an unauthorized manner. Altered documents may contain the PII of real individuals or false identities created by the person who altered the document.

### *Reference Materials Maintained by IDEAL*

In addition to the documents, the HSI-FL stores *reference materials* obtained from the United States and other nations in both the HSI-FL Library and IDEAL. Reference materials include formal communications issued by domestic and foreign government agencies to highlight potential counterfeit characteristics, fraud, security features, and other information valuable to the forensic analysis of travel and identity documents, and to assist authorities in better identifying fraudulent documents. Reference materials also include more informal communications received from these agencies, such as emails, for the same purposes. Reference materials are intended to provide information useful in identifying fraudulent documents for law enforcement, immigration, border, and forensic personnel, and not to disseminate information about particular individuals or groups known or suspected of engaging in document fraud. Reference materials, however, may contain PII incidentally because they display images of counterfeit or altered documents for illustrative, educational, and forensic purposes. Reference materials are categorized in IDEAL according to the category of the document they address. For example, reference materials from a government or law enforcement organization describing a common feature of a counterfeit document will be classified as a counterfeit reference material. Reference materials addressing verified documents are classified as verified reference materials.

When the HSI-FL receives a genuine standard document, it always includes it in the HSI-FL Library and in IDEAL. When the HSI-FL receives a document for potential inclusion in the HSI-FL Library that is not a genuine standard document, it is first reviewed to determine whether it should be retained in the HSI-FL Library, returned to the source of the document, or destroyed. The HSI-FL's decision to include a document in the HSI-FL Library is made based upon the need for that particular kind of document within the HSI-FL Library. For example, a fraudulent document, such as an altered passport, could be used for training of outside agency personnel on how to recognize altered passports. The HSI-FL employee making this determination uses IDEAL to establish whether the HSI-FL Library already contains that type of document and/or a genuine standard document to compare it to in order to verify its authenticity.<sup>4</sup>

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<sup>4</sup> Whereas IDEAL is used as a reference tool, daily forensic casework is tracked in a separate system called the Laboratory Information Management System.





Documents added to the HSI-FL Library are considered unverified until forensically examined. The HSI-FL manually scans the document into IDEAL, and relevant PII and other identifying information are recorded in IDEAL. The HSI-FL then categorizes the documents in IDEAL as verified, altered, counterfeit, or unverified. After the scanning and entry of information, the HSI-FL sends the documents through quality control, indexing, and index verification to ensure an accurate image of the document and information regarding the document is represented in IDEAL. Reference materials are scanned and entered into IDEAL in the same manner as documents.

Documents and reference materials may be located in IDEAL by searching for the IDEAL ID number or the unique bar code and also through searches of other identifying information. For example, IDEAL may be searched by country of origin to locate all documents and reference materials in the HSI-FL Library for a specific country. IDEAL may also be searched by the document number, which includes passport numbers, driver's license numbers, state identification numbers, alien registration numbers, etc.

#### *Use of IDEAL Outside of DHS*

Certain designated users at the DOS have read-only access to IDEAL. This read-only access allows certain designated DOS employees to search and view travel and identity documents and reference materials in IDEAL. These documents and materials may contain the PII of actual individuals. This information is used by the DOS for its reference and use in support of its mission. This use includes supporting the processing of petitions or applications for benefits under the Immigration and Nationality Act, and other immigration and nationality laws including treaties and reciprocal agreements. Authorized users from the DOS are the only non-DHS users with direct access to IDEAL.

In addition to the routine sharing with the DOS, the HSI-FL does respond to inquiries from, and perform forensic examinations for, foreign and domestic government and law enforcement agencies. In these circumstances, on a case-by-case basis, hard copy and electronic copies of documents and reference materials from IDEAL may be shared. However, in such cases, ICE pixilates (obscures) all PII, as well as images, contained in the documents and reference materials prior to sharing. Information in IDEAL, hard copy documents, and reference materials may also be used for training and educational uses. However, similar to the inquiries from foreign and domestic government and law enforcement agencies, no PII is shared other than images of individuals who have provided their consent. These individuals are those on genuine standard documents that do not contain the PII of actual individuals; however, they may contain photographs of individuals who have consented for their images to be used and distributed on these sample documents.



## **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?**

ICE has broad authority to investigate crimes involving the use of false travel or identification documents. Typically, such illegal documents are used to gain entry into the United States and/or to obtain a benefit. Accordingly, the HSI-FL conducts analysis on a variety of documents used for these illicit purposes. Documents may include, but are not limited to, counterfeit or altered passports, visas, birth certificates, permanent resident cards, marriage certificates, divorce decrees, and death certificates. The HSI-FL examinations and analysis support the enforcement of the following criminal statutes:

- 18 U.S.C. § 496 - Counterfeit writings related to customs duties;
- 18 U.S.C. § 911 - False claim of U.S. citizenship;
- 18 U.S.C. § 1001 - False statements or entries;
- 18 U.S.C. § 1028 - Fraud and related activity in connection with identity documents;
- 18 U.S.C. § 1425 - Procurement of citizenship or naturalization unlawfully;
- 18 U.S.C. § 1426 - Reproduction of naturalization or citizenship papers;
- 18 U.S.C. § 1427 - Sale of naturalization or citizenship papers;
- 18 U.S.C. § 1541 - Issuance without authority;
- 18 U.S.C. § 1543 - Forgery or false use of a passport; and
- 18 U.S.C. § 1546 - Fraud and misuse of visas, permits, and other documents.

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

The DHS/ICE-014 Homeland Security Investigations Forensic Laboratory System of Records Notice, published concurrently with this PIA, applies to the information maintained in IDEAL.

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

A Security Authorization was approved for the system on August 27, 2010.





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

No. NARA determined the records maintained in IDEAL do not need to be scheduled because they are reference materials and therefore are not federal records under the Federal Records Act.

## **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.**

This system does not conduct information collections from the public and therefore it is not subject to the requirements of the Paperwork Reduction Act.

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

The following questions are intended to define the scope of the information requested and/or collected, as well as reasons for its collection.

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

IDEAL contains electronic images and identifying information for all documents and reference materials stored in the HSI-FL Library. All documents added to the HSI-FL Library are indexed and assigned an automatically generated IDEAL ID Number and a separate bar code number, providing a standard identification and tracking mechanism and permitting indexing. Document characteristics are entered into IDEAL to catalogue, track, and facilitate searching. Depending on the particular document, the document characteristics entered into specific fields in IDEAL may include country of origin, region, document type, document numbers (*e.g.*, passport number, driver's license number, state identification number), authenticity of the document, information regarding the location and availability of the hard copy document in the HSI-FL Library, and a short description of the document. With the exception of document numbers, PII is neither manually entered into IDEAL nor searchable. Further, SSNs are not directly entered into IDEAL; instead, the serial number on the back of the document is entered into the system. Names and dates of birth are also not directly entered into IDEAL as they are not necessary to catalogue, track, or search for a document.



While SSNs, names, and dates of birth are not specifically entered into IDEAL, they are captured in IDEAL as images of documents scanned and stored in IDEAL. However, the text appearing on the stored images may only be viewed and is not searchable.

In addition to the documents, the HSI-FL stores reference materials in the HSI-FL Library and IDEAL. Similar to documents, reference materials added to the HSI-FL Library are indexed and assigned an IDEAL ID Number and a separate bar code number by IDEAL, providing a standard identification and tracking mechanism and permitting indexing. In addition, certain identifying information may be entered to catalogue, track, and facilitate searching. Depending on the particular reference material, this information may include the country, region, and authenticity of the related document. Reference materials are categorized in IDEAL according to the category of document they address. For example, reference materials describing a common feature of a counterfeit document will be classified as a counterfeit reference material. In addition, as reference materials can contain images of counterfeit or altered documents, and can be used for illustrative, educational, and forensic purposes, they may contain PII.

Reference materials may be issued by governments to highlight potential counterfeit characteristics, fraud, security features, and other information valuable to the forensic analysis of travel and identity documents, and to assist authorities in better identifying fraudulent documents. Reference materials also include more informal information provided by the United States and foreign governments for the same purposes. Generally, reference materials do not focus on particular individuals who are known or suspected to be engaging in document fraud.

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

The DOS, and other federal, state, and foreign government agencies, law enforcement organizations, and international organizations provide documents and reference materials to the HSI-FL for potential inclusion in the HSI-FL Library. Documents are mailed or physically delivered to the HSI-FL for inclusion in the HSI-FL Library and IDEAL. As discussed in the overview, documents are categorized as genuine standard, verified, unverified, altered, or counterfeit documents. Genuine standard documents are documents that have never been used in circulation and were officially submitted to the HSI-FL by a valid issuing authority or other officially recognized authority of a foreign country, U.S. federal government, or U.S. state.

The four remaining categories of documents - verified, unverified, altered, and counterfeit - are obtained from various sources including government agencies and law enforcement organizations in the United States and abroad, and international organizations. Through their international contacts with foreign governments, the DOS provides the HSI-FL with the great majority of these documents. In addition, documents may be incorporated into IDEAL, with the permission of the submitting agency, after they were obtained during law enforcement actions. For



example, counterfeit and altered documents may be seized during shipment through the U.S. mail. Following their use by law enforcement and any resulting judicial proceedings, the documents may be provided to the HSI-FL for potential inclusion in the HSI-FL Library. Finally, U.S. states may provide drivers' licenses and other forms of identification for potential inclusion in the HSI-FL Library.

Reference materials are obtained from the same sources providing documents including United States and foreign government agencies and law enforcement organizations. Like documents, the majority of reference materials are also obtained from the DOS. These materials are mailed, emailed, or physically delivered to the HSI-FL for inclusion in the HSI-FL Library and IDEAL.

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

IDEAL is an internal law enforcement system and does not use information from public or commercial sources.

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

All documents and reference materials added to the HSI-FL Library and IDEAL are indexed and assigned an automatically generated IDEAL ID Number and a separate bar code number, providing a standard identification and tracking mechanism and permitting indexing. The bar code is also physically attached to the documents and reference materials themselves whenever possible; when not possible the bar code is attached to their protecting sleeve.

Following this initial inclusion in IDEAL, HSI-FL supervisors review the document or reference material for accuracy and approve the document or reference material for use within IDEAL. IDEAL automatically records information reflecting employee interaction with documents and reference materials in IDEAL including their viewing, editing, deleting, indexing, and printing of information contained in the system. This information is audited by the IDEAL System Administrator.

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

**Privacy Risk**: IDEAL could present a risk of the over-collection of PII.

**Mitigation**: ICE only collects information in IDEAL necessary to support the HSI-FL's mission to conduct forensic document analysis in support of law enforcement investigations and activities by DHS and other agencies. Additionally, the SSNs maintained in IDEAL are not directly entered into IDEAL. Further, names and dates of birth are also not directly entered into IDEAL as



they are not necessary to catalogue, track, or search for a document. While PII such as SSNs, names, and dates of birth are not specifically entered into IDEAL, they are captured in IDEAL as images of documents are scanned and stored in IDEAL. However, the PII stored on the images is view only and may not be searched or used in any other manner in IDEAL.

## **Section 3.0 Uses of the Information**

The following questions require a clear description of the project's use of information.

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

IDEAL provides an index and inventory control of all documents and reference materials catalogued in the HSI-FL Library. IDEAL does not serve as a case management system for the HSI-FL and none of the results of the HSI-FL examinations are stored in IDEAL. IDEAL allows HSI-FL personnel to quickly access electronic images of documents and reference materials to assist in analysis of travel and identity documents submitted for analysis, and to provide inventory control of the hard copy material in the HSI-FL Library, which includes the support of "checking out" hard copy documents and reference materials by HSI-FL employees. Documents and reference materials may be located in IDEAL by searching for the IDEAL ID Number, a unique bar code, and also through searches of other identifying information. For example, IDEAL may be searched by country of origin to locate all documents and reference materials in the HSI-FL Library for a specific country. IDEAL may also be searched by the document number, which includes passport numbers, driver's license numbers, state identification numbers, alien registration numbers, etc.

Documents checked out from the HSI-FL Library using IDEAL may then be physically inspected and examined by an HSI-FL employee to assist with the examinations of documents submitted to the HSI-FL for forensic examinations. The HSI-FL performs forensic examinations to respond to requests for document authentication from DHS and other federal, state, and international government agencies. During such examinations, HSI-FL employees use documents maintained in the HSI-FL Library of the type of document being examined to help determine its authenticity. HSI-FL employees also make use of reference materials from the United States and other nations containing useful information such as descriptions of security features of travel and identity documents, attempts to counterfeit or alter such documents, and other general information regarding documents. Results from these examinations assist DHS and other government agencies with the authentication of documents and may be used in the course of law enforcement investigations, immigration benefit determinations, and could be admitted into evidence in judicial proceedings. As noted above, none of the results of the HSI-FL examinations are stored in IDEAL. It merely assists HSI-FL employees in locating, verifying, and storing documents in the HSI-FL Library. IDEAL does not serve as a case management system for the HSI-FL.



### **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.**

IDEAL 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?**

Yes, certain designated users at U.S. Customs and Border Protection (CBP), U.S. Citizenship and Immigration Services (USCIS), and U.S. Secret Service (USSS) have read-only user access to IDEAL. This read-only access allows certain designated CBP, USCIS, and USSS employees to search and view travel and identity documents and reference materials in IDEAL. These documents and materials may contain the PII of actual individuals. This information is used by CBP, USCIS, and USSS to assist with their validation of travel and identity documents. USCIS will review documents and reference materials in IDEAL to assist in determining immigration benefits and deterring fraud. This review will assist with the validation of documents submitted to USCIS and identify the need for further review by the HSI-FL. CBP will use IDEAL in law enforcement investigations and in assisting with validation of documents at U.S. border crossings and ports of entry. USSS will explore IDEAL for information on document security features and collaborative ways of sharing information between the components.

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

**Privacy Risk:** There is a privacy risk of unauthorized access to the information maintained in IDEAL.

**Mitigation:** To mitigate this risk, IDEAL employs appropriate role-based access controls so only authorized users have access to the system. The access roles are assigned by the IDEAL System Administrator, who ensures users are only granted access to information necessary to perform their official duties. Only System Administrators can access and change all fields in the database. IDEAL users must read and acknowledge the HSI-FL Rules of Behavior before gaining access to IDEAL. All database users complete annual agency mandated privacy and security training, which stresses the importance of appropriate and authorized use of personal data in government systems.

**Privacy Risk:** There is a privacy risk that the documents stored and maintained within IDEAL may be used for a purpose inconsistent with ICE's law enforcement mission.



**Mitigation:** All uses listed above are compatible with the original purpose for which the information was collected, namely to serve as a reference for verification and validation of travel and identity documents. In addition, all external sharing is compatible with the original purpose for which the information was collected and falls within the scope of the published routine uses defined in the SORN identified in Question 1.2.

## Section 4.0 Notice

The following questions seek information about the project's notice to the individual about the information collected, the right to consent to uses of said information, and the right to decline to provide information.

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

As IDEAL is not a primary information collection system, notice is not provided to individuals prior to IDEAL's collection of information. The HSI-FL obtains these documents and reference materials from domestic and foreign government agencies and law enforcement organizations and international organizations. IDEAL does not obtain documents and reference materials directly from individuals. As noted above, one category of documents, *genuine standard documents*, are produced by valid issuing authorities as samples of particular travel and identity documents (e.g., passports) and include all of the same characteristics and security features of that document. Genuine standard documents are usually issued under an obviously fictitious name, such as "Happy Traveler," to ensure they are easily identified as samples. Genuine standard documents do not contain the PII of actual individuals; however, they may contain photographs of individuals who have consented for their images to be used and distributed on these sample documents. General notice is provided by this PIA as well as the publication of the SORN identified in Question 1.2.

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

Since information in IDEAL is primarily received from other sources, individuals do not have the option to consent to particular uses of their information once transmitted to IDEAL.

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

**Privacy Risk:** There is a risk that individuals are not aware of the existence of IDEAL and the data it collects and maintains.





**Mitigation:** This PIA serves as public notice of the existence of IDEAL and the data it collects and maintains. Additional notice is also provided by the publication of the SORN identified in Question 1.2.

## Section 5.0 Data Retention by the project

The following questions are intended to outline how long the project retains the information after the initial collection.

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

The HSI-FL Library is unique within the federal government and remains the premier resource for the scientific authentication, research, and analysis of travel and identity documents and issues. Documents and reference materials may be directly provided for inclusion in the HSI-FL Library or may be initially provided for other purposes such as forensic examination and then retained by the HSI-FL, with the submitting agency's permission, after the examination is complete. The HSI-FL determines whether to include specific documents in the HSI-FL Library based upon the HSI-FL Library's need for that document, particularly whether the HSI-FL Library currently has a document of that type already in the HSI-FL Library. NARA determined the records maintained in IDEAL do not need to be scheduled because they are reference materials and therefore are not federal records under the Federal Records Act. Thus, all documents and reference materials are maintained in the HSI-FL Library until the HSI-FL Unit Chief determines their retention is no longer necessary. As the electronic record of all information in the HSI-FL Library, information entered into IDEAL is also retained until the HSI-FL Unit Chief determines their retention is no longer necessary.

### **5.2 Privacy Impact Analysis: Related to Retention**

**Privacy Risk:** There is a privacy risk that information will be retained for longer than necessary to accomplish the purpose for which the information was originally collected.

**Mitigation:** The HSI-FL Library is unique within the federal government and remains the premier resource for the scientific authentication, research, and analysis of travel and identity documents and issues. As IDEAL contains electronic images and document characteristics for all documents and reference materials stored in the HSI-FL Library rather than documents maintained for specific cases as part of a case management system, there is a reduced risk to the individual that the information retained for long periods of time will be taken out of context.



## Section 6.0 Information Sharing

The following questions are intended to describe the scope of the project information sharing external to the Department. External sharing encompasses sharing with other federal, state and local government, and private sector entities.

### **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.**

Information in IDEAL is shared with the DOS. Certain designated employees in the DOS are provided with read-only user access to IDEAL. This allows certain designated DOS employees to search and view travel and identity documents and reference materials in IDEAL to assist with their validation of travel and identity documents. These documents and materials may contain the PII of actual individuals.

In addition, the HSI-FL responds to inquiries from and performs forensic examinations for foreign and domestic government and law enforcement agencies. With regard to forensic examinations, external government and law enforcement agencies submit documents for examination. The HSI-FL examines the documents and returns the documents only to the submitting agency. Accordingly, the same information submitted is returned and no additional PII is added. The results from the requested forensic examination, including a written explanation of the HSI-FL employee's findings are provided to the requesting agency. In these circumstances, on a case-by-case basis, hard copy and electronic copies of documents and reference materials from IDEAL may be shared. ICE pixilates (obscures) all PII, as well as images, contained in the documents and reference materials prior to sharing.

Finally, information in IDEAL and hard copy documents and reference materials may also be used for training and educational uses. However, similar to the inquiries from foreign and domestic government and law enforcement agencies, no PII is shared other than images of individuals who have provided their consent.

### **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 purpose for which the information was collected, namely to serve as a reference for verification and validation of travel and identity documents. All external sharing falls within the scope of the published routine uses defined in the SORN identified in Question 1.2.



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

Yes. Information shared with the DOS may not be re-disseminated without the prior consent of the HSI-FL. As noted above, the results from a requested forensic examination, including a written explanation of the HSI-FL employee's findings are provided to the requesting agency. In these circumstances, on a case by case basis, hard copy and electronic copies of documents and reference materials from IDEAL may be shared. The information provided by the HSI-FL does not contain PII but, in addition, may not be re-disseminated without the HSI-FL's prior consent.

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

The DOS has read-only access to information in IDEAL. Their access to records is tracked by event logs in IDEAL, is reviewed by the System Administrator, and may be audited. When an outside agency requests a copy of a document within IDEAL the request is manually logged and also entered into IDEAL. Results are sent via email or in hard copy to the requesting official.

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

**Privacy Risk:** The privacy risk associated with this external sharing is the possible improper dissemination or compromise of information maintained in IDEAL.

**Mitigation:** The privacy risk is minimal. PII in IDEAL is shared with the DOS. Certain designated employees in the DOS are provided with read-only access to IDEAL. This read-only access allows certain designated DOS employees to search and view travel and identity documents and reference materials in IDEAL to assist with their validation of travel and identity documents. For any sharing of information contained in IDEAL with other domestic or foreign government or law enforcement agencies HSI-FL first pixilates any PII or images of individuals prior to sharing. Finally, information received from outside law enforcement agencies for forensic examination is only returned to the submitting agency. Accordingly, the same information submitted is returned and no additional PII is added.



## Section 7.0 Redress

The following questions seek information about processes in place for individuals to seek redress which may include access to records about themselves, ensuring the accuracy of the information collected about them, and/or filing complaints.

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

Individuals may request access to records about them in IDEAL by following the procedures outlined in the DHS/ICE-014 Homeland Security Investigations Forensic Laboratory System of Records Notice, published concurrently with this PIA. All or some of the requested information may be exempt from access pursuant to the Privacy Act in order to prevent harm to law enforcement investigations or interests.

In addition to the procedures above, individuals seeking notification of and access to any record contained in the ICE instance of IDEAL, or seeking to contest its content, may submit a request in writing to the ICE Freedom of Information Act (FOIA) Office. Please contact the ICE FOIA Office at (866) 633-1182 or see the ICE FOIA Office's website for additional information (<http://www.ice.gov/foia>). If an individual believes more than one component maintains Privacy Act records concerning him or her, the individual may submit the request to the Chief Privacy Officer, Department of Homeland Security, 245 Murray Drive, SW, Building 410, STOP-0550, Washington, DC 20528.

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

If individuals may obtain access to the information in IDEAL pursuant to the procedures outlined in the DHS/ICE-014 Homeland Security Investigations Forensic Laboratory System of Records Notice, published concurrently with this PIA, they may seek correction of any incorrect information in the system by submitting a request to correct the data. All or some of the requested information may be exempt from amendment pursuant to the Privacy Act in order to prevent harm to law enforcement investigations or interests. Amendment of the records could interfere with ongoing investigations and law enforcement activities and may impose an impossible administrative burden on investigative agencies.

Individuals seeking notification of and access to any record contained in IDEAL or the source system, or seeking to contest its content, may submit a request in writing to the component's FOIA Officer, whose contact information can be found at <http://www.dhs.gov/foia> under "contacts." If an individual believes more than one component maintains Privacy Act records concerning him or her the individual may submit the request to the Chief Privacy Officer,



Department of Homeland Security, 245 Murray Drive, S.W., Building 410, STOP-0550, Washington, D.C. 20528.

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

The procedure for submitting a request to correct information is outlined in the DHS/ICE-014 Homeland Security Investigations Forensic Laboratory System of Records Notice, published concurrently with this PIA, and in this PIA in Questions 7.1 and 7.2.

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

**Privacy Risk:** There is a risk that individuals may not have access to information maintained about them in IDEAL or be able to correct their information.

**Mitigation:** Individuals can request access to information about them through the FOIA process and may also request that their information be corrected as described above.

## **Section 8.0 Auditing and Accountability**

The following questions are intended to describe technical and policy based safeguards and security measures.

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

A physical inventory of documents contained in the library is conducted twice yearly. During these audits, the physical records are compared with the data entered into IDEAL. In addition, during these audits the system administrator performs reviews log-in and usage records.

The work product entered into IDEAL is continuously reviewed by HSI-FL supervisors. Event logs reflect which employees have accessed a particular document. The following actions below are recorded in the log file and are reviewed by the System Administrator: indexed documents, system search, barcode search, country search, and evidence searched and entered.

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

All ICE employees and contractors complete annual mandatory privacy and security training. Additionally, all users receive on-the-job training regarding the proper use of IDEAL.



### **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 IDEAL is strictly controlled by HSI-FL supervisors in cooperation with the system administrator. Direct access to IDEAL is limited to authorized HSI-FL personnel conducting official analysis of fingerprints and documents. The system restricts a user's data access and usage rights depending on their needs in IDEAL based upon their job responsibilities.

The System Administrator provides access to the IDEAL system for HSI-FL employees only when instructed to do so by the employee's first line supervisor. The following are the IDEAL user roles:

***Indexers*** have privileges to scan, enter, search, view, and index documents and reference materials into IDEAL and affix the IDEAL-generated bar codes to the documents and reference materials for placement in the HSI-FL Library. During this process, Indexers also enter document characteristics into IDEAL to create the record of the document and/or reference material in IDEAL.

***General Users*** have read-only access to IDEAL and can search and view documents and reference materials in IDEAL. In addition, they have the ability to use IDEAL to check-in/out documents and reference materials from the HSI-FL library.

***Non-ICE Users*** DOS, CBP, USCIS, and USSS users granted access to IDEAL have read-only access to IDEAL and can search and view documents and reference materials in IDEAL.

***System Administrator*** has privileges to create accounts, change user roles, change and update system configurations, and perform other general administrative work for the system.





## **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?**

In the event of future changes concerning information in IDEAL, new users of IDEAL, or intended uses of the information collected and maintained in the system, the HSI-FL would engage the ICE Privacy Office to discuss the intended expanded users and/or uses of this information and update the relevant privacy compliance documentation (including this PIA) as appropriate.

### **Responsible Officials**

Lyn Rahilly  
Privacy Officer  
U.S. Immigration and Customs Enforcement  
Department of Homeland Security

### **Approval Signature**

Original signed copy on file with the DHS Privacy Office.

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Jonathan R. Cantor  
Acting Chief Privacy Officer  
Department of Homeland Security