



Privacy Impact Assessment  
for the

Department of Homeland Security – Victim Information  
and Notification Exchange (DHS-VINE)

**DHS/ICE/PIA-047**

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## Abstract

The Department of Homeland Security Victim Information and Notification Exchange (DHS-VINE) is a new system that DHS U.S. Immigration and Customs Enforcement (ICE) Enforcement and Removal Operations (ERO) established to automatically notify certain individuals about changes to a particular alien’s custodial status with ICE. These particular aliens, referred to in this Privacy Impact Assessment (PIA) as “aliens,” include those who have been charged with a crime, and those convicted of a crime, so long as a crime victim or victim advocate has registered with DHS-VINE to be notified upon change to the alien’s custodial status with ICE. For purposes of the DHS-VINE system, individuals eligible to receive custody status notifications – hereafter “eligible registrants” – are victims and witnesses associated with aliens charged or convicted of a crime (at the federal or state level), as well as “victim advocates.” Victim advocates are individuals with a legal responsibility to act on behalf of a victim or witness (*e.g.*, attorneys, parents, legal guardians) and individuals acting at the request of a victim or witness. DHS-VINE will allow eligible registrants to directly register for custodial status notifications via a web interface, and will also transfer eligible registrant data from a State VINE<sup>1</sup> database (hereafter “State VINE”) to ensure those individuals who registered with State VINE continue to receive custody status updates once an alien is transferred from state to ICE custody. This PIA details the protections that are in place for the personally identifiable information (PII) pertaining to eligible registrants, aliens, that DHS-VINE collects, uses, and maintains.

## Overview

ICE has partnered with a vendor<sup>2</sup> to develop DHS-VINE in an effort to streamline the processes by which individuals can register for and receive notifications regarding changes to an alien’s custodial status with ICE.

DHS-VINE will automatically notify eligible registrants by phone, text message, and/or email (based on the registrant’s preference)<sup>3</sup> of changes to an alien’s custody status with ICE once the alien has been taken into ICE custody. These notifications will indicate that the alien has either been booked into ICE custody or out of ICE custody (specifying whether the alien was released from custody or removed from the United States). By providing these notifications, DHS-VINE ensures that eligible registrants are aware that a particular alien is either in ICE custody, has been

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<sup>1</sup> VINE currently exists in several states, whereby victims can register to receive custody status notifications for offenders in state custody. State VINE is a single database shared by every state that participates in VINE.

<sup>2</sup> The vendor that will operate DHS-VINE also operates the State VINE database that will be used to match an alien record in ICE’s Enforcement Integrated Database (EID) with a state offender record. This matching process is discussed below.

<sup>3</sup> Registrants may choose to be notified by any or all of the three methods discussed in this PIA.



removed from the United States, or has been released from ICE custody. This awareness allows registrants to take protective action (such as contacting law enforcement or other protective measures), if necessary.

DHS-VINE will be used by three types of individuals: (1) registrants; (2) ERO Victim Witness Coordinators (VWC); and (3) the vendor's Help Desk personnel known as Victim Service Representatives (VSR). The ways in which these individuals will use DHS-VINE are discussed below.

DHS-VINE has two interfaces – DHS VINELink and DHS-VINEWatch. DHS-VINELink is the public web interface (website), on which individuals can register to receive custody status notifications regarding an alien. DHS-VINEWatch is the internal web interface used by VWCs and VSRs. Both of these web interfaces are discussed throughout this PIA.

Prior to the implementation of DHS-VINE, the ICE Homeland Security Investigations (HSI) Victim Assistance Program (VAP) assisted ERO with its victim notification process by collecting victim information on a paper form.<sup>4</sup> Victims (or victim advocates) provided the relevant information on the form and submitted it to VAP personnel. HSI sent the form to ERO officers at the appropriate detention facility so that ERO could provide the custody status notifications by phone or postal mail.

DHS-VINE will remove HSI VAP from this process, replace the use of the paper form, and streamline and automate ERO's notification processes involving ERO detainees. It will provide:

- A standardized, automated registration process for eligible registrants to receive alien custody status notifications;
- An automated custody status notification process for eligible registrants; and
- An automated process for transferring State VINE registrants to DHS-VINE to ensure victims of state crimes continue to receive custody status notifications once aliens associated with a State VINE registrant been transferred from state to ICE custody.

An individual can register directly with DHS-VINE only if the alien for whom he or she wishes to receive custody status notifications is already in ICE custody. However, if an individual has already registered with State VINE to receive custody status notifications of an alien, the State VINE registrant's contact information will be shared with DHS-VINE. The registrant will first be notified by State VINE that the offender has been released from state custody. Then, DHS-VINE will notify these State VINE registrants once the alien has been taken into ICE custody, and the registrant can then decide whether he or she wishes to continue receiving updates about the alien's

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<sup>4</sup> [https://www.dhs.gov/sites/default/files/publications/ht\\_ice\\_victim\\_notification\\_brochure\\_0.pdf](https://www.dhs.gov/sites/default/files/publications/ht_ice_victim_notification_brochure_0.pdf).



custody status. Registrant information is not stored in DHS-VINE until the registrant agrees to continue receiving custody status notifications. In order to provide adequate notifications to these individuals, DHS-VINE must match the record of the alien in ICE custody with the record of the State criminal detainee to make sure that the notification relates to the correct individual. The matching, registration, and notification processes are discussed in full detail below.

### *The DHS-VINE Matching Process*

In order to provide notifications regarding the appropriate alien to individuals who have transferred their State VINE registration to DHS-VINE, the system must match a record in the State VINE database with an alien record in Enforcement Integrated Database (EID).<sup>5</sup> DHS-VINE will use EID web services to search a limited subset of extracted biographic information as well as detainer information from EID. There is no direct system connection between DHS-VINE and EID; DHS-VINE will use EID web services to pull in all records of aliens from EID for whom ICE has placed an immigration detainer.

Under the DHS Priority Enforcement Program (PEP), DHS works with state and local law enforcement so that it may take custody of individuals who pose a danger to public safety before those individuals are released to the community.<sup>6</sup>

- In the first type of detainer (Form I-247N, *Request for Voluntary Notification of Release of Suspected Priority Alien*)<sup>7</sup>, ICE requests that the local law enforcement agency (LEA) notify ICE pending release of a suspected priority removable individual at least 48 hours before release. This allows ICE to determine whether there is probable cause to conclude that the subject is a removable alien.
- In the second type of detainer (Form I-247D, *Immigration Detainer - Request for Voluntary Action*)<sup>8</sup>, ICE requests the LEA to maintain custody of the priority individual for no longer than 48 hours. ICE must identify the enforcement priority under which the individual falls, as well as the basis for its determination of probable cause.
- The third type of detainer (Form I-247X, *Request for Voluntary Transfer*)<sup>9</sup> is for enforcement priorities that do not fall under the PEP.

For purposes of this PIA, the term “detainer” may refer to any or all of the three options above.

Once the alien records from EID have been placed into DHS-VINE, DHS-VINE will then use the vendor’s web service to automatically search the State VINE database to determine if there is a match between an individual in State VINE and an alien record from EID. EID web services

<sup>5</sup> See DHS/ICE/PIA-015 Enforcement Integrated Database (EID), available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

<sup>6</sup> See Priority Enforcement Program, available at <https://www.ice.gov/pep>.

<sup>7</sup> <https://www.ice.gov/sites/default/files/documents/Document/2016/I-247N.pdf>.

<sup>8</sup> <https://www.ice.gov/sites/default/files/documents/Document/2016/I-247D.pdf>.

<sup>9</sup> <https://www.ice.gov/sites/default/files/documents/Document/2016/I-247X.pdf>.



will try to match certain data elements, such as: alien's full name, country of birth, date of birth, race, gender, eye color, hair color, Federal Bureau of Investigation (FBI) number, State ID number<sup>10</sup>, and driver's license number. The data elements used in the matching process are listed in Question 2.1 below. DHS-VINE will store these data elements after they are pulled from EID, but will not store any information from State VINE that it uses in the matching process. If DHS-VINE is able to match an individual in State VINE with an alien record in EID, the vendor's web service will then search the State VINE database to determine if there are any individuals registered with State VINE to receive custody status notifications about that alien. If the vendor's web service is able to match a State VINE registrant with a specific alien, then the registrant will continue to receive notifications from State VINE until ICE has taken the alien into custody. Once the alien is in ICE custody, DHS-VINE will notify the registrant that the alien has been taken into ICE custody, and the individual can choose either to continue receiving custody status notifications or can opt-out of receiving future notifications. To continue receiving notifications, the individual must attest that he or she is an eligible registrant as discussed in the "Notification" section above.

Even if the vendor's web service is unable to match an alien record in EID with a record in State VINE, aliens for whom ICE has placed a detainer will remain in DHS-VINE indefinitely so that a match can be made in the future. Once ICE has executed on the detainer and either released the alien from custody or removed the alien from the United States, the alien record will be removed from DHS-VINE within two weeks per the proposed National Archives and Records Administration (NARA) records retention schedule.

Identifying information belonging to an alien who falls within certain protected classes will be blocked from ICE's Online Detainee Locator System (ODLS) for the alien's safety, and therefore, will also be blocked from DHS-VINE.<sup>11</sup> Specifically, an alien who has applied for, or was granted protection under the Violence Against Women Act (VAWA) or a T or U nonimmigrant visa, as a matter of law and policy, will have his or her information blocked from ODLS and DHS-VINE. This protection ends only when the application for relief is denied and all opportunities for appeal of the denial have been exhausted. DHS will not disclose any information relating to the alien's application (including the fact that the alien has applied for such benefits), except as authorized under applicable law or policy.<sup>12</sup> If an alien's record is marked as being

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<sup>10</sup> State ID cards are used by individuals who do not drive, but still need to be able to provide their identity, age, and address. This includes people not yet old enough to obtain a driver's license, those who do not drive at all, and individuals who may have had their driver's license suspended or revoked. Each State ID card contains a corresponding State ID number.

<sup>11</sup> With respect to aliens who applied for, or were granted protection under the Violence Against Women Act (VAWA) or the T or U visa, ICE will add a code to their record during initial book-in to mask them from ODLS. On a case-by-case basis, aliens who do not fall into these protected categories may also have their identifying information blocked from ODLS and DHS-VINE based on concern for their safety, *e.g.*, confidential informants and asylum seekers. Additionally, ODLS does not contain information on minors (individuals under 18 years of age).

<sup>12</sup> See DHS Directive Number: 002-02 "Implementation of Section 1367 Information Provisions", available at: <https://www.dhs.gov/sites/default/files/publications/implementation-of-section-%201367-%20information->



blocked from ODLS, the alien's record is flagged in ICE's EID to ensure the alien's information is not shared through DHS-VINE.<sup>13</sup>

### *The DHS-VINE Registration Process*

There are three ways that registrations are created in DHS-VINE: (1) an individual registers using DHS-VINELink; (2) a VWC or VSR registers the individual using DHS-VINEWatch; or (3) an individual's State VINE registration is transferred to DHS-VINE.

### **DHS-VINELink**

DHS-VINELink is a public website on which individuals who are victims of federal or state crimes can register to receive automated custody status notifications regarding an alien. Individuals can first search for a specific alien in ICE custody by providing either: (1) the alien number ("A-Number") and country of birth of the alien; or (2) the first name, last name, and country of birth of the alien. The individual also has the option of entering the alien's date of birth to narrow down the search results. These alien identification requirements are identical to those required to receive detainee custody location information from ICE's ODLS website.<sup>14</sup> If the individual is able to locate the appropriate alien and wishes to register for notifications, he or she must first attest under penalty of perjury that he or she is an eligible registrant by checking the appropriate box on the registration screen. If an individual is either unable to provide the required information regarding the alien or the alien is not in ICE custody, the individual will not be able to register using DHS-VINELink.<sup>15</sup>

If the individual can positively identify an alien with the ODLS criteria, he or she will be directed to a screen displaying the following information regarding the alien: name, age, country of birth, race, custody status, and a link to the facility where the alien is being detained. This link contains contact information for the facility, such as the facility's mailing address and phone number. The screen will display all aliens who match the information entered by the user. For example, if the DHS-VINELink user searched by entering the alien's name and country of birth,

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[provisions-directive-002-02\\_0.pdf](#).

<sup>13</sup> In the regular course of business, ERO officers check the relevant databases of United States Citizenship and Immigration Services (USCIS) to confirm that the alien falls into a special protected class. It is a violation of 8 U.S.C. § 1367 to "permit use by or disclosure to anyone (other than a sworn officer or employee of [DHS] for legitimate [DHS] purposes) of any information which relates to an alien who is the beneficiary of an application for [VAWA or T or U nonimmigrant status]." This limitation ends only when the application for relief is denied and all opportunities for appeal of the denial have been exhausted. Officers will make a notation in EID for any aliens who belong to a special protected class, whose information is blocked from ODLS and DHS-VINE. Information regarding minors is also blocked from both.

<sup>14</sup> ODLS allows individuals to search for detainees currently in ICE custody or who have been released from ICE custody within the past 60 days. ODLS is available at: <https://locator.ice.gov/odls/homePage.do>. See DHS/ICE/PIA-019 ODLS, available at: [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

<sup>15</sup> In the event that the alien is not in ICE custody, DHS-VINELink also allows the user to search for an offender in state custody by providing a link to the State VINE database.



it is possible that multiple aliens match those criteria. If this is the case, the individual can either enter the alien's date of birth to narrow down the search results, or call the appropriate ERO field office or VWC mailbox (as described below in the DHS-VINEWatch section) for assistance in helping to identify the correct alien.

If the search only returns one result, the DHS-VINELink user can then click on the button saying: "Notify Me of Status Changes." If the individual clicks this button, he or she will then enter his or her contact information (phone number and/or email address) as well as a user-generated 4-digit PIN and indicate at least one method of notification (audio by phone, text message, and/or email). The phone number and/or email address, if provided, and the 4-digit PIN are the only pieces of information collected and stored by DHS-VINE that pertain to the eligible registrant. Once these steps have been completed, the individual has successfully registered with DHS-VINE and will be notified when there is a change in the alien's custody status. The content of the notification is discussed in the "Notification" section below.

Individuals can also use DHS-VINELink to perform ad-hoc searches to get custodial information regarding aliens. As discussed above, if a VINELink user enters either the alien's A-Number and country of birth or the alien's full name and country of birth, he or she can search DHS-VINELink to see if there are any aliens in ICE custody matching these criteria. This functionality does not require the individual to register with DHS-VINE. However, if the individual does not register with DHS-VINE, he or she will not receive automated notifications regarding the alien's custodial status.

There is also an automated phone line for individuals who either do not have internet access or who have previously registered with DHS-VINE and need to change certain account information, or wish to hear current custody status information. Individuals who lack internet access and have not yet registered with DHS-VINE can call this number to receive information about crime victim services<sup>16</sup> and to speak with a VSR to register. DHS-VINE registrants can use this automated phone line to change their phone number or PIN, opt out of future notifications, and receive information about crime victim services. Registrants can also get custody status updates for the alien with whom they have been associated in the system by entering their phone number, PIN, and either the alien's A-number or first and last name. The system will then tell the caller whether or not the alien is booked into ICE custody. Individuals cannot register for DHS-VINE using the automated system.

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<sup>16</sup> The DHS-VINE automated phone line will provide a basic description and contact information for agencies such as Mothers Against Drunk Driving, The National Domestic Violence Hotline, The National Center for Victims of Crime, etc.



## DHS-VINEWatch

DHS-VINEWatch is the internal website of DHS-VINE used by VSRs and VWCs to assist individuals in the DHS-VINE registration process. If an individual is unable to register using DHS-VINELink or has questions about the registration process, he or she can call a VSR using a toll-free number that is located on the DHS-VINELink website. When an individual calls this number, a VSR will try and assist the caller with the registration process and/or any other questions regarding DHS-VINE. The VSR will only be able to register the individual into DHS-VINEWatch if the individual can provide the same information that is required on the DHS-VINELink website (the ODLs criteria). If the individual is able to provide this information regarding the alien and attests that he or she is an eligible registrant,<sup>17</sup> then the VSR can register the individual into DHS-VINEWatch by obtaining the caller's phone number or email address based upon the individual's preferred method of notification (audio by phone, text message, and/or email) and 4-digit PIN. If the caller is unable to provide the required information and requires additional assistance, the VSR can refer the caller either to the appropriate ERO field office so that the caller can speak directly with a VWC or to a VWC dedicated mailbox where the caller can leave a voicemail to receive a return call from a VWC.

VWCs are ERO officers who have been delegated victim witness coordination responsibilities as a collateral duty by an ERO Field Office Director. VWCs are located in each of ERO's 24 field offices. Unlike VSRs who can only register individuals using the ODLs criteria, VWCs can assist the individual with the registration process by determining if the caller has additional information regarding the alien that would serve to confirm the individual's association with the alien. In order for a VWC to register an individual with DHS-VINEWatch, the caller must provide either the alien's full name or A-Number, as well as one of the following pieces of information pertaining to the alien: date of birth, FBI number, State ID number (SID), Department ID Number (DIN), last facility of incarceration (and state), jail ID or inmate booking number, criminal case information (case number and court information), or the alien's criminal conviction (and state). In obtaining this information, ERO is not recording any information either in paper form or within DHS-VINE; VWCs are simply checking whether the information provided by the caller matches the information contained in EID. Prior to using the system, ERO will provide VWCs with Standard Operating Procedures (SOP) to explain the VWCs' roles and responsibilities as they pertain to how DHS-VINE operates and how to properly handle PII.

If the caller is able to provide sufficient information to identify an alien and attests that he or she is an eligible registrant, the VWC can register the individual using DHS-VINEWatch by

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<sup>17</sup> Both VSRs and VWCs will use a script that includes the same affirmation language the registrants see when using DHS-VINELink. This will ensure that the caller attests to his or her status as an eligible registrant. When VSRs and VWCs register these individuals with DHS-VINE, they will make a notation in the comment section of the registration in DHS-VINEWatch indicating that the individual properly attested to his or her eligibility.



entering the caller's contact information (phone number and/or email address) as well as the caller's 4-digit PIN. If the individual cannot provide enough information to adequately identify an alien, he or she will not be able to register for DHS-VINE and will not be eligible to receive custody status notifications. Both VSRs and VWCs can also use DHS-VINEWatch to discontinue notifications to the registrant (based on the registrant's choice) and to update the registrant's contact information or PIN.

DHS-VINEWatch will also have the capability to produce reports and metrics including the numbers of notifications provided and the dates that the notifications were made. These reports are only accessible to authorized VINEWatch users, and any PII contained in the reports is information to which VINEWatch users already have access.

### **Transferring an Existing State VINE Registration to DHS-VINE**

Those who have previously registered with State VINE to receive custody status updates regarding an individual in state custody will receive a notification informing him or her when the individual has been booked into ICE custody. The State VINE registrant will receive this notification by the method chosen when he or she registered with State VINE (audio by phone, text message, and/or email). If the notification is by phone, the individual must attest under penalty of perjury that he or she is an eligible registrant by pressing the corresponding button after hearing the prompt, and then decide whether or not he or she wishes to continue to receive updates regarding the alien's custody status. The caller will also be provided with the phone number to speak with a VSR if he or she requires additional assistance.

If the initial notification is by text message or email, the registrant is provided a link as well as a 5-character confirmation code. The individual must then click on the link, attest that he or she is an eligible registrant, and enter his or her phone number and/or email address and the corresponding 5-character confirmation code. Once the individual enters this information, he or she will continue to receive custody status updates regarding the applicable alien.

#### *Notifications to Eligible Registrants*

ERO updates an alien's record in the ICE EID whenever there is a change in the alien's custody status (*e.g.*, the alien was removed from the United States, released from ICE custody, or booked into ICE custody). A process known as EID web services allows this information to be shared with DHS-VINE so that ICE can provide up-to-date custody status notifications to eligible registrants.

When an individual registers with DHS-VINE by any of the methods discussed above, he or she must indicate at least one method of notification (audio by phone, text message, and/or email) in order to receive custody status notifications. If the registrant chooses to receive notifications by phone, he or she will receive an automated phone call to the phone number provided during registration when there is a change in the custody status of the applicable alien.



The recording will first ask the registrant to enter his or her 4-digit PIN that was created during the registration process. The registrant then must attest under penalty of perjury to his or her status as an eligible registrant in order to receive custody status updates. If the registrant properly attests and enters the correct PIN, the recording will provide the first and last name of the appropriate alien along with the following information: (1) the location (state) and date that the alien was released from ICE custody; (2) the date that the alien was removed from the United States; or (3) the location (state) and date that the alien was booked into ICE custody.

If the individual chooses to be notified either by text message or email, DHS-VINE will send automated notifications to the appropriate cell phone number or email address to provide custody status updates. The text message or email will direct the registrant to DHS-VINELink, where the registrant then must enter the correct PIN and attest under penalty of perjury that he or she is an eligible registrant. Once the individual has successfully attested to his or her status, DHS-VINE will provide the same information regarding the alien to the registrant whether the registrant chooses to be notified by phone, text message, or email. DHS-VINE will also provide all registrants (regardless of the notification method) with the phone number to contact a VSR for additional assistance or to discontinue notifications.

## **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?**

DHS has been authorized to collect information under 5 U.S.C. § 301; 8 U.S.C. § 1103; 8 U.S.C. § 1225(d)(3); and the Illegal Immigration Reform and Immigrant Responsibility Act of 1996<sup>18</sup>.

Pursuant to the Homeland Security Act of 2002 (Pub. L. No. 107-296, Nov. 25, 2002), the Secretary of Homeland Security has the authority to enforce numerous federal criminal and civil laws. These include, but are not limited to, laws residing in Titles 8, 18, 19, 21, 22, 31, and 50 of the U.S. Code. The Secretary delegated this authority to ICE in DHS Delegation Number 7030.2, Delegation of Authority to the Assistant Secretary for the Bureau of Immigration and Customs Enforcement and the Reorganization Plan Modification for the Department of Homeland Security (January 30, 2003).

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<sup>18</sup> Pub. L. 104-208, 110 Stat 3009-546, Sep. 30, 1996.



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

The Criminal Arrest Records and Immigration Enforcement Records (CARIER) System of Records Notice (SORN)<sup>19</sup> applies to the information in DHS-VINE.

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

Yes. A system security plan was completed prior to the system being deployed.

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

ICE has developed a proposed records retention schedule for DHS-VINE to be approved by the National Archives and Records Administration (NARA). In accordance with the proposed records retention schedule for DHS-VINE, records from EID pertaining to aliens on whom ICE has placed a detainer will remain in DHS-VINE indefinitely so that the system can continue to match an alien record in EID with an offender's record in State VINE. Once the alien has either been removed from the United States or released from ICE custody, the alien record will be removed from the system after three years. Specific information regarding the records retention schedule is described in detail in Question 5.1.

## **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 collection is exempt from the PRA, and falls under the exemption for electronic subscriptions to agency notifications or publications.<sup>20</sup>

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<sup>19</sup> DHS/ICE-011 Criminal Arrest Records and Immigration Enforcement Records (CARIER), 81 FR 72080 (Oct. 19 2016). The CARIER SORN has replaced what was formerly known as the ENFORCE SORN.

<sup>20</sup> See [https://www.whitehouse.gov/sites/default/files/omb/assets/infogov/SocialMediaGuidance\\_04072010.pdf](https://www.whitehouse.gov/sites/default/files/omb/assets/infogov/SocialMediaGuidance_04072010.pdf).



## 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.**

#### *Registrant Information*

From DHS-VINE registrants, the system only collects the contact information the registrant provides (phone number and/or email address) and the user-generated 4-digit PIN.

#### *Alien Information*

DHS-VINE contains the following data from EID related to aliens: full name, country of birth, date of birth, A-Number, detention location, FBI number, State ID number, fingerprint ID number (FIN), passport number, driver's license number, eye color, hair color, height, weight, gender, and race.

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

#### *Eligible Registrants*

Eligible registrants may provide their own information directly to DHS-VINE using DHS-VINELink. Eligible registrants also may provide their information to VSRs and VWCs who then input that information into DHS-VINE using DHS-VINEWatch.

#### *State VINE database*

State VINE registrant information includes the individual's phone number and/or email address. Registrant information will be transferred to DHS-VINE once the alien for whom the individual registered to receive custody status notifications has been booked into ICE custody, and the registrant has agreed to continue receiving custody status notifications from DHS-VINE. State detainee information used in the matching process includes: full name, country of birth, date of birth, A-Number, detention location, FBI number, State ID number, FIN, passport number, driver's license number, eye color, hair color, height, weight, gender, and race. However, all alien information in DHS-VINE comes from EID. The web services described above will try to match certain data elements from an alien record in EID with a detainee record in State VINE. If there is a match, the applicable alien record from EID will be stored in DHS-VINE so that eligible registrants can receive custody status notifications. The detainee's record from State VINE will not be stored in DHS-VINE, and ICE employees do not have access to the State VINE database.



## *EID*

DHS-VINE will receive information regarding aliens from ICE's EID via EID web services. EID will provide DHS-VINE with the alien's full name, country of birth, date of birth, A-Number, detention location, FBI number, State ID number, FIN, passport number, driver's license number, eye color, hair color, height, weight, gender, and race. EID is the only source from which DHS-VINE will collect and store alien information. Much of the information in EID is collected directly from the alien or the alien's identity and travel documents during law enforcement encounters or other DHS proceedings, increasing the likelihood that the information is accurate. EID also records any changes to an alien's custody status by using codes that correspond to the action taken. When EID web services searches EID, it will note these codes and update the alien records in DHS-VINE accordingly. Based on the codes, DHS-VINE can send the appropriate notification to the corresponding registrant.

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

No. DHS-VINE does not use information from commercial sources or publicly available data.

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

#### *Registrant data*

In most cases, the individual registrant will provide his or her own information directly to either DHS-VINE or to the State VINE for which he or she initially registered. Because these registrants are providing their information themselves, this information is assumed to be accurate. Additionally, VSRs and VWCs are required to take training on the proper use of DHS VINEWatch to ensure they understand how to input registrant contact information correctly and appropriately protect it.

#### *Alien data*

The information in EID that is used in the DHS-VINE matching process is collected directly from the alien or the alien's identity and travel documents during law enforcement encounters, the immigration benefits and enforcement process, or other DHS activities or proceedings by trained officers and personnel, thereby increasing the likelihood that the information is accurate. EID information is subject to rigorous and continual data quality review processes established to detect employee errors and make appropriate corrections. Additionally, EID users undergo mandatory user training for the system during training for new officers and agents. As discussed in footnote 5 above, information regarding aliens in special protected classes (e.g., an alien who has applied for VAWA or a T or U visa) will not be accessible to DHS-VINE



registrants. Information regarding minors (those under 18 years old) will also not be accessible in DHS-VINE.

The information contained in the State VINE database that is associated with the EID data is collected from state and local law enforcement agencies. The demographic information is often collected from the individual's driver's license, passport, government-issued State ID cards, and/or the FBI's Next Generation Identification System (NGI).<sup>21</sup>

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

**Privacy Risk:** There is a risk that the personal information collected by DHS-VINE will not be accurate.

**Mitigation:** This risk is mitigated by the fact that individuals who register directly with DHS-VINE will personally provide and, in many cases, input their own information. Also, registrants whose registrations are transferred from State VINE systems personally provide their information to the applicable State VINE. If a DHS-VINE registrant needs to update or correct the information contained in DHS-VINE, he or she can either make these corrections by using DHS-VINELink or by contacting a VSR or a VWC for assistance, either of whom can update this information in DHS-VINEWatch. Both VSRs and VWCs are provided training on how to use DHS-VINEWatch in order to accurately enter registrant data. This training includes information on ensuring quality review prior to final submission of a registrant's information.

This risk is also mitigated regarding alien information because these data elements are ingested directly from EID via EID web services. As discussed above, EID takes many steps to ensure the accuracy and integrity of its data. EID information is subjected to data quality review processes established to detect employee errors and make appropriate corrections. For example, EID information is reviewed by an agent or officer's first line supervisor before a criminal or administrative process is allowed to proceed. Each application within EID also has field-level checks on data to ensure a minimum level of quality and completeness. Because EID relies on a central dataset rather than separate datasets for each application, the user need only correct the data in a single application to ensure it is corrected throughout EID. Additionally, EID users undergo mandatory user training for the system during training for new officers and agents. Finally, ERO officers routinely check with United States Citizenship and Immigration Services (USCIS) to determine if any ICE detainee falls into a special protected class (*e.g.*, applicants for VAWA or a

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<sup>21</sup> Privacy Impact Assessment for the FBI's Next Generation Identification System (NGI) *available at:* <https://www.fbi.gov/services/records-management/foipa/privacy-impact-assessments/next-generation-identification-ngi-retention-and-searching-of-noncriminal-justice-fingerprint-submissions> (September 2015). DHS-VINE will not receive any biometric data from NGI.



T or U visa). This ensures that the information regarding aliens in these special protected classes is not stored in DHS-VINE.

Finally, this risk is mitigated by the accuracy of the DHS-VINE matching process. As discussed above, DHS-VINE uses web services to match alien data in EID with detainee data from State VINE so that State VINE registrants can register with DHS-VINE. These web services use exact match searching, meaning that only records of aliens whose information perfectly aligns are stored in DHS-VINE. If DHS-VINE matches the first name, last name, and date of birth, then it will store the alien's record. DHS-VINE will also use the web services discussed above to match personal identifiers such as the FBI number, State ID number, and driver's license number, as well as biographic information such as the individual's gender, race, hair color, and eye color. Matching as many criteria as possible greatly enhances the probability that the alien record in EID relates to the same detainee in State VINE, and reduces the risk that DHS-VINE contains records regarding aliens whose information should not be in the system.

**Privacy Risk:** There is a risk that unnecessary or prohibited information will be collected in DHS-VINE.

**Mitigation:** This risk is mitigated because DHS-VINE collects the minimum amount of information necessary to notify eligible registrants of the change of an alien's custody status. By creating an automated notification process, the system is designed to either call, text, or email the registrant with the custody status information based on the preferred method of notification. In addition, all users of DHS-VINE are specifically trained in handling information regarding victims and understand the sensitivity of these issues. Only specified personnel (VSRs and VWCs) will have access to the registrant or alien information stored in DHS-VINE. Training will be provided to both the VSRs and VWCs, which provides information regarding the mission of the program. The training will also discuss how to determine if PII is sensitive in nature and how to properly handle any DHS-VINE data. Furthermore, ERO officers and systemic indicators ensure that information is blocked from the system regarding aliens who fall into certain protected classes (*e.g.*, aliens who have applied for VAWA or a T or U visa). Information regarding minors is also blocked from both DHS-VINE.

**Privacy Risk:** Because DHS-VINELink is accessible to the public, there is a risk of exposing too much personal information about aliens in the search results.

**Mitigation:** This risk is partially mitigated by intentionally limiting the detainee information displayed in the search results to only that information which is necessary to allow the user to identify a specific alien and determine his or her custodial status and location. Although EID contains a large volume of information regarding aliens, DHS-VINE only displays a very small subset to the public. DHS needs to provide sufficient information so that individuals can identify the appropriate alien in order to register to receive custody status notifications. In addition,



DHS-VINE places controls around the search function so that an individual must provide specific information regarding the alien in order to perform a search.

## 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.

DHS-VINE collects the registrant's phone number and/or email address in order to notify the individual regarding a custody status change of a particular alien. When an individual registers with DHS-VINE (either directly or by having his or her registration transferred from State VINE), he or she will specify the preferred method of notification (text message, audio by phone, and/or email). The registrant's phone number and email address will only be used so that DHS-VINE can provide automated custody status notifications regarding the alien.

DHS-VINE collects the alien's name, country of birth, date of birth, and other identifying information (discussed above) in order to properly match an alien record in EID with an individual in the State VINE system. If DHS-VINE is able to match the alien record pulled from EID with the record in the State VINE system, it is then able to provide notifications regarding the alien's custody status to any individuals who are registered to receive them.

### 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.

No.

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

No. DHS-VINE is used exclusively by ICE.

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

**Privacy Risk:** There is a risk that individuals other than eligible registrants may use the system to get notifications on aliens in whom they have an interest.

**Mitigation:** This risk is partially mitigated. Individuals who register with DHS-VINE must attest under penalty of perjury that they are eligible to receive custody status notifications (*i.e.*, that they are either victims of crimes, witnesses of crimes, or victim advocates). Individuals who register using DHS-VINELink must check the appropriate box indicating that they are eligible



registrants. This attestation is stored in DHS-VINE for reporting purposes. Individuals who register by phone (either with a VSR or VWC) also must attest verbally that they are eligible registrants. The VSR or VWC will then make a note in the “comments” section of DHS-VINEWatch indicating that the individual attested to his or her status as an eligible registrant.<sup>22</sup> These attestations are captured for use in a possible perjury prosecution. If the individual is convicted of committing perjury, he or she could face monetary fines or time in prison.

Furthermore, although anyone can search for a detainee using DHS-VINE, the system is designed to ensure that only users who know specific information about the detainee can perform a successful search. For example, users must enter at least two discrete identifying pieces of information about the alien (country of birth and either the alien’s full name or A-Number) to successfully search the system. In addition, DHS-VINE uses exact-match searching to help limit the search results returned, thereby avoiding over-exposure of alien data. While it is still possible that a search using name and country of birth may return multiple individuals if the searched name is common, the alien information provided in the search results is limited, and is designed so that registrants can properly identify the appropriate alien.

## 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.**

#### *Notice to Registrants*

ICE provides notice to eligible registrants both via DHS-VINELink and when registrants are assisted by VWCs or VSRs. The DHS-VINELink website clearly indicates via a privacy notice the information that is required to register for DHS-VINE (either phone number or email address), and that failure to provide that information will prevent the individual from completing registration. Similarly, VWCs and VSRs ask for these same data elements if an individual wishes to register by phone. It is then the individual’s choice whether or not to provide this information. ICE further provides notice to eligible registrants through the publication of this Privacy Impact Assessment (PIA) and the updates to the DHS/ICE-011 CARIER SORN.<sup>23</sup>

<sup>22</sup> ERO has developed SOPs that instruct DHS-VINEWatch users to record this attestation in the system.

<sup>23</sup> DHS/ICE-011 Criminal Arrest Records and Immigration Enforcement Records (CARIER), 81 FR 72080 (Oct. 19



## *Notice to Aliens*

ICE provides notice to aliens regarding providing custody status notifications through the publication of this PIA. ICE also provides notice to aliens about the collection of their information at the time of detention through the publication of the Enforcement Integrated Database (EID) PIA. Much of the information in EID is collected directly from an alien during an encounter, and these individuals are advised in writing and orally of their right to refuse to provide information pursuant to the Fifth Amendment. Aliens are further put on notice that their custodial status could be disclosed to eligible registrants based on Routine use BB of the DHS/ICE-011 CARRIER SORN. Finally, ERO officers inform aliens in ICE custody that their information can be disclosed for purposes of the ODLS. Officers will also inform aliens that their information may be used to notify individuals of their custodial status. Each ERO field office has designated at least one officer as its VWC, who will be trained on new procedures related to DHS-VINE. This includes notifying aliens in custody about the system, and informing aliens that their information will be masked from DHS-VINE if they fall into a special protected class (*e.g.*, applicants for VAWA or a T or U visa). Finally, ERO has created SOPs that detail how VWCs will fulfill their roles as they pertain to DHS-VINE.

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

For eligible registrants, providing information to DHS-VINE is completely voluntary. If an individual chooses to register with DHS-VINE, his or her phone number and/or email address will be stored in the system. Individuals who have previously registered with State VINE must affirmatively opt in to continue receiving custody status notifications from DHS-VINE. If these individuals choose not to opt in, their information will not be loaded into DHS-VINE. Individuals who have registered using DHS-VINELink and/or previously elected to have their information transferred from State VINE may discontinue notifications online via DHS-VINELink or call either a VSR or VWC if they no longer wish to receive notifications. The information pertaining to these individuals will then be removed from DHS-VINE.

Those aliens whose information is masked from the ODLS due to confidentiality laws, based on threats to their safety, or because they are minors, will also have their custody status information blocked from DHS-VINE. Otherwise, DHS-VINE will have access to the alien's personal information for purposes of matching and to provide notifications to the registered individuals.

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

**Privacy Risk:** There is a risk that DHS-VINE does not provide adequate notice to the

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2016). The CARRIER SORN has replaced what was formerly known as the ENFORCE SORN.



individuals about whom it collects information.

**Mitigation:** This risk is mitigated with regard to eligible registrants because the individual can choose whether or not he or she wishes to register with DHS-VINE. If the individual chooses to register, the DHS-VINELink website states that the individual must enter his or her phone number and/or email address, as well as a 4-digit PIN. The DHS-VINELink privacy notice also informs registrants about what information is collected, how the information is used, and that providing the information is completely voluntary.

If an individual's registration has been transferred from State VINE to DHS-VINE, he or she will automatically receive a notification when the alien in question has been transferred to ICE custody. At that time, the registrant will be asked whether he or she wishes to continue receiving future notifications regarding the alien's custody status. If the registrant wishes to continue, DHS-VINE will store the registrant's information in order to provide custody status notifications. If the registrant opts out of future notifications, his or her registration is deleted in the system. However, DHS-VINE maintains the registrant's "delivery address" (his or her email address or phone number) for purposes of auditing and reporting. Maintaining this information allows DHS-VINE to track all notifications that the system has made. Therefore, if a registrant indicates that he or she never received a notification regarding the appropriate alien, DHS-VINEWatch users can query the system to confirm the date, time, and delivery address of past notifications.

With regard to aliens, this risk is mitigated because aliens at the time they are encountered are advised of their Fifth Amendment rights to decline to provide information. ERO officers also inform aliens in ICE custody that their information may be used to notify individuals of their custodial status just as they already inform aliens that their information will be stored in ODLs.

This risk is also mitigated by the publication of this PIA and the CARRIER SORN, both of which provide registrants and aliens with information on how their information may be used.

**Privacy Risk:** There is a risk that individuals about whom information is collected will not fully understand how DHS uses their information.

**Mitigation:** This risk is mitigated by the publication of this PIA, which fully addresses how DHS-VINE collects, uses, stores, and shares personal information in a way that these individuals can understand. Further, the DHS/ICE-011 CARRIER SORN has been updated to add a new routine use indicating that DHS can disclose the custody status of an alien to eligible registrant(s).

Additionally, DHS-VINELink contains a detailed privacy notice to increase transparency, thereby informing users why certain information is collected, how it will be used, and that users have a choice in providing this information.



## 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.

In accordance with the proposed records retention schedule for DHS-VINE, records from EID pertaining to aliens on whom ICE has placed a detainer will remain in DHS-VINE indefinitely so that the system can continue to match an alien record in EID with an offender's record in State VINE. Once the alien has either been removed from the United States or released from ICE custody, the alien record will be removed from the system after three years.

DHS-VINE registrant information is only stored if: (1) ICE has placed a detainer on the appropriate alien; or (2) the alien for whom the individual registered to receive custody status notifications is currently in ICE custody. Registrant information will be removed from the system three years after the alien for whom the individual was registered to receive notifications was either removed from the United States or released from ICE custody, per the proposed records retention schedule.

Additionally, a notification record is stored for 99 years so that DHS-VINE can track the history of notifications made by the system to eligible registrants. The notification record contains a confirmation receipt, which includes the delivery address (registrant phone number and/or email address) and delivery timestamp. The contents of the notification itself are not stored. Until this records retention schedule has been approved by NARA, all DHS-VINE records (regarding both the registrant and the alien) will be treated as permanent.

### 5.2 Privacy Impact Analysis: Related to Retention

**Privacy Risk:** There is a risk that the information will be retained in the system for longer than it needs to fulfill the program's mission.

**Mitigation:** ICE proposes to retain DHS-VINE registrant/victim data for periods that are appropriately tailored to serve the purpose of the system and to maintain adequate records of the agency's disclosure of alien's custodial status. Tailoring retention periods minimizes the risk that information is retained longer than necessary and that all information contained in the system continues to be relevant to the program and the agency's mission.

DHS-VINE registrant information is only stored if: (1) ICE has placed a detainer on the appropriate alien; or (2) the alien for whom the individual registered to receive custody status notifications is currently in ICE custody. Registrant information will be removed from the system three years after the alien for whom the individual was registered to receive notifications was either removed from the United States or released from ICE custody.



Records of aliens either currently in ICE custody or for whom ICE has placed a detainer will remain in DHS-VINE for indefinitely so that the system can continue to match the EID record with an offender record in State VINE. If the alien records were to be retained for a shorter period, this would significantly hinder the matching process, and ERO could not provide custody status notifications to eligible registrants, thus defeating the purpose of the DHS-VINE mission. Once the alien has either been released from ICE custody or removed from the United States, the alien records will be removed from DHS-VINE after three years.

Finally, ICE retains a notification log to track a history of notifications made by DHS-VINE for 99 years. This notification record indicates the date and time that a notification was made to a particular eligible registrant. The 99-year retention period ensures that ICE has records of all notifications for the lifetime of the registrant.

## 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.**

Yes. DHS-VINE will share information regarding the custody status of aliens with eligible registrants. DHS-VINE registrants will be notified when the alien for whom they have registered to receive custody status notifications has been booked into ICE custody, released from ICE custody, or removed from the United States. These notifications are necessary so that eligible registrants are aware of the movement of certain aliens and can take protective actions, should they deem it necessary.

DHS will also share both victim and alien information with the vendor VSRs for the purpose of providing call center services. This information sharing is necessary to enable VSRs to assist victims with the registration process.

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

Routine use BB of the DHS/ICE 011-CARRIER SORN allows DHS to share custody status updates of aliens to eligible registrants. Sharing this information is compatible with the purpose of collection because providing custody status updates of aliens to eligible registrants permits registrants to take appropriate protective actions they feel necessary. These victim protections are



compatible with the enforcement function of the DHS/ICE-011 CARRIER SORN. The inability to share this information would not allow DHS-VINE to serve its essential purpose.

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

No. DHS-VINE does not place limits on the registrant's re-dissemination of the information they receive, as ICE is unable to control what registrants do with the information upon receipt. However, by requiring the individual to both attest to his or her status as an eligible registrant and enter the corresponding PIN, ICE makes every effort to ensure that the notification is only being disseminated to the appropriate eligible registrant.

DHS-VINE however, does limit re-dissemination of the information by the vendor. The vendor and its employees are contractually bound to protect the information to which they have access in the same way as ICE employees. The DHS-VINE contract requires the vendor to comply with federal and agency privacy and records management policies, including those policies associated with the safeguarding of records covered by the Privacy Act.

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

DHS-VINE records when it sends a notification to an individual and also records whether the notification is successfully delivered. This information is all logged automatically by the system for reporting and auditing purposes.

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

**Privacy Risk:** There is a risk that alien information will be shared with individuals other than the eligible registrant.

**Mitigation:** This risk is mitigated by the fact that DHS-VINE registrants must both attest that they are eligible to receive custody status notifications and enter their corresponding PIN to receive the notification, thereby providing as much assurance as possible that ICE is providing the notification to the appropriate individual. Additionally, the information contained in the notification is extremely limited in scope and contains information that can be found by anyone using ODLS.

In certain circumstances, re-dissemination of the alien's custody status could be beneficial. For example, if a victim advocate is registered to receive custody status notifications about a specific alien, the advocate can then inform the appropriate victim of the status, allowing the victim to take protective action, if necessary. A registrant could also disseminate this information to local law enforcement for protection. Finally, failure to release this information to eligible registrants defeats the purpose of the DHS-VINE system, as registrants must be aware of the movement of the alien.



Finally, in ICE's contract with the vendor for DHS-VINE services, the vendor employees (VSRs) are contractually bound to protect ICE information in the same manner as ICE employees. The vendor agrees to protect the PII collected and stored in DHS-VINE against unauthorized access, disclosure, or modification; theft; or destruction. DHS-VINE must follow standard security protocols as required by federal law of all Government systems. The vendor's IT security plan complies with applicable federal law related to information security.<sup>24</sup>

## 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 seeking notification of and access to any record contained in this system may submit a request in writing to the ICE Freedom of Information Act (FOIA) officer by mail:

U.S. Immigration and Customs Enforcement  
Freedom of Information Act Office  
500 12<sup>th</sup> Street SW, Stop 5009  
Washington, D.C. 20536-5009  
(202) 732-0660  
<http://www.ice.gov/foia/>

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. Providing individual access to records contained in DHS-VINE could inform the subject of an actual or potential criminal, civil, or regulatory violation investigation or reveal investigative interest on the part of DHS or another agency. Access to records could also permit the individual who is the subject of a record to impede the investigation, tamper with witnesses or evidence, or avoid detection or apprehension or could reasonably be expected to endanger the life or physical safety of any DHS-VINE registrant or ICE detainee.

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<sup>24</sup> e.g., the Computer Security Act of 1987 (40 U.S.C. 1441 et seq.); the Government Information Security Reform Act of 2000; and the Federal Information Security Management Act of 2002. The vendor must also comply with federal policies and procedures that include, but are not limited to, OMB Circular A-130.



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

Individuals seeking to correct records contained in this system of records, or seeking to contest its content, may submit a request in writing to the ICE Privacy and Records Office by mail:

U.S. Immigration and Customs Enforcement  
Privacy and Records Office  
Attn: Privacy Branch  
500 12th Street SW, Stop 5004  
Washington, D.C. 20536-5004  
(202) 732-3300  
<http://www.ice.gov/management-administration/privacy>

All or some of the requested information may be exempt from correction pursuant to the Privacy Act in order to prevent harm to law enforcement investigations or interests. With regard to detainee information, any corrections would be made in EID, the source system for DHS-VINE alien records.

DHS-VINE registrants can also correct and update their information either online via DHS-VINELink or by speaking with a VSR or VWC who can update this information using DHS-VINEWatch.

## 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 this PIA, the CARRIER SORN, and the ICE Privacy public website.<sup>25</sup> As stated above, individuals may submit requests for information and correction as permitted by the Privacy Act, which will be reviewed and corrected on a case-by-case basis.

## 7.4 Privacy Impact Analysis: Related to Redress

**Privacy Risk:** With regard to DHS-VINE registrants, there is a privacy risk that after the registration process, the registrant may not be able to access or correct his or her information.

**Mitigation:** This risk is mitigated by the fact that DHS-VINE registrants can update and correct their personal information (phone number and/or email address) either by editing this information within DHS-VINELink or by contacting a VSR or VWC. Both VSRs and VWCs can then make any necessary corrections to a registrant's information in DHS-VINEWatch.

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<sup>25</sup> See ICE Office of Information Governance and Privacy, available at: <https://www.ice.gov/management-administration/igp>.



**Privacy Risk:** There is a risk that that aliens will not be able to correct inaccurate information.

**Mitigation:** Information regarding aliens is taken from EID and any corrections to alien information will be updated in EID. The DHS-VINE database will be refreshed periodically to accurately reflect the alien’s information held in EID, thereby ensuring that the information is consistent between the two systems. However, since DHS exempts EID from certain provisions of the Privacy Act, aliens will not be able to access or correct information housed in EID. This risk is mitigated through a rigorous and continual data quality review process established to detect errors and make appropriate corrections or updates.

**Privacy Risk:** There is a risk that aliens are unaware that ICE ERO officers can mask alien identifying information from ODLS (and therefore DHS-VINE) if they fall into a special protected class.

**Mitigation:** It is a violation of 8 U.S.C. § 1367 to “permit use by or disclosure to anyone (other than a sworn officer or employee of [DHS] for legitimate [DHS] purposes) of any information which relates to an alien who is the beneficiary of an application for [VAWA or T or U nonimmigrant status].” This limitation ends only when the application for relief is denied and all opportunities for appeal of the denial have been exhausted. Detainees cannot withhold their information from ODLS unless an application is on file with USCIS for either VAWA or a T or U visa. DHS will not disclose any information relating to the alien’s application (including the fact that the alien has applied for such benefits), except as authorized under applicable law or policy. In the regular course of business, ERO officers check USCIS records regarding the immigration status of every alien who comes into ICE custody, which includes determining whether an alien falls into a special protected class (*e.g.*, an applicant for VAWA or a T or U visa). If so, the officer flags the alien’s record in EID so that information is blocked from both ODLS and DHS-VINE.<sup>26</sup> Minors in ICE custody also have their information masked in DHS-VINE and ODLS.

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<sup>26</sup> Detainees may also self-identify as falling into a special protected class by providing this information to an ERO officer on a form. However, the ERO officer will confirm this information is accurate by verifying the information against USCIS records.



## 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?**

DHS-VINEWatch users (VWCs and VSRs) are given training and have access to SOPs regarding how the system works and how to handle PII in accordance with applicable laws and regulations. These users also use a script to confirm that the caller attests to his or her status as an eligible registrant and to collect information regarding the alien. All calls received by VSRs are subject to quality assurance and spot checks by the vendor. Furthermore, the system collects a very limited amount of information from registrants, and the automated process will ensure that the information will only be used for the notification process as outlined in this PIA. Finally, VSRs have significant experience in handling sensitive victim information, as they are trained employees of the vendor that operates State VINE.

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

All ICE personnel and contractors are required to take the DHS annual privacy and information security training as well as DHS records management training. The vendor also provides a training manual to ICE personnel on using DHS-VINEWatch. Additionally, the vendor provides annual training in information privacy, data security, and victim sensitivity for its personnel involved in the project as required under the contract.

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

Only VWCs and VSRs who require access to the data in DHS-VINEWatch as a part of the performance of their official duties are granted access to the system. Regarding registrant data, access is limited to the registrant's phone number or email address, depending upon the preferred method of notification. Regarding alien data, VSRs (vendor employees) will only have access to information that can be found using DHS-VINELink (*e.g.*, alien's name, country of birth, date of birth, facility information). VWCs have access to additional alien information contained in EID, as required for performance of their regular duties as ERO officers, and may use this information to confirm the eligibility of registrants who they assist. No other individuals will have access to DHS-VINE or the data contained within 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?**

At this time, there are no sharing agreements or MOUs. Any sharing agreements and MOUs that may be developed in the future will be reviewed by the program manager, the ICE Privacy Officer, the ICE Office of the Principal Legal Advisor, and DHS. Any new accesses to the system or new uses of the information would be approved by the program manager, in consultation with the ICE Privacy Officer, and this PIA would be updated and reviewed by DHS accordingly.

### **Responsible Officials**

Amber Smith  
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