



# Privacy Impact Assessment

for the

## Systematic Alien Verification for Entitlements Program

**DHS Reference No. DHS/USCIS/PIA-006(c)**

**June 30, 2020**



**Homeland  
Security**



## Abstract

The U.S. Department of Homeland Security (DHS), U.S. Citizenship and Immigration Services (USCIS), Verification Division administers the Systematic Alien Verification for Entitlements (SAVE) Program. SAVE is a fee-based inter-governmental initiative designed to help federal, state, tribal, and local government agencies confirm citizenship and immigration status prior to granting benefits and licenses, as well as for other lawful purposes. The purpose of this update is to discuss the changes to SAVE, including: (1) a new information collection, (2) the use of the Person Centric Entity Resolution microservice, (3) migration to a cloud-hosted environment, (4) transition from a paper-based process to a paperless process, and (5) to inform the public of USCIS's use of information from SAVE in administering bonds posted as security for performance and fulfillment of the financial obligations of a bonded alien (someone who is not a U.S. Citizen) to the U.S. Government. USCIS is publishing an update to this Privacy Impact Assessment (PIA) to describe the collection, use, maintenance, and disclosure of personally identifiable information (PII), as well as the risks associated with these updates.

## Overview

The Systematic Alien Verification for Entitlements (SAVE) Program is a fee-based intergovernmental initiative that provides citizenship and immigration status to the extent that such information is necessary to enable federal, state, tribal, and local government agencies, benefit-granting agencies, private entities, institutions, and licensing bureaus (hereafter referred to as "user agencies") authorized by law to make decisions related to: (1) determining eligibility for a federal, state, tribal, or local public benefit; (2) issuing a license or grant; (3) issuing a government credential; (4) conducting a background investigation; or (5) any other lawful purpose. Uses of SAVE may include but are not limited to issuing Social Security benefits, unemployment benefits, education assistance, housing assistance, public health care, Supplemental Nutrition Assistance Program (SNAP) benefits, Temporary Assistance for Needy Families (TANF), Medicaid, Children's Health Insurance Program (CHIP), conducting background investigations, armed forces recruitment, REAL ID compliance, and other purposes authorized by law. SAVE does not provide determinations regarding an applicant's eligibility for a specific benefit or license; only the user agency can make that determination.

SAVE interacts exclusively with registered federal, state, tribal, or local government benefit-granting agencies, license granting agencies, and private entities, such as Airport Operators, seeking to verify the citizenship and immigration status of an immigrant, non-immigrant, and certain naturalized and derived U.S. citizens. All SAVE user agencies<sup>1</sup> are required to formalize the purpose and use in which they use SAVE through a Memorandum of Agreement

---

<sup>1</sup> The SAVE MOA and CMA templates define the parties and refer to the SAVE user as a "User Agency," even if the SAVE user is not, in fact, an agency.



(MOA) or Computer Matching Agreement (CMA). The MOA or CMA establishes the terms and conditions for the user agency's participation in SAVE. Those terms and conditions are binding responsibilities, which include proper usage and handling of SAVE information, using any information provided by SAVE solely for the purpose of determining the eligibility of persons applying for the benefit issued by the user agency, limiting use of such information in accordance with the MOA or CMA, and safeguarding the information that SAVE provides. SAVE also charges a fee based on the number and type of transactions that are conducted on behalf of the user agency.

### **SAVE Process**

An individual (applicant) applies for a benefit (e.g., unemployment benefits, education assistance, housing assistance) directly with the user agency. The user agency works directly with the applicant to determine if he or she is eligible to receive the applicant's requested benefits or license. Using SAVE, the user agency submits an initial request based on the information provided by the applicant and is required to include a numeric identifier (e.g., Alien Number (A-Number), I-94 Arrival/Departure record number, Student and Exchange Visitor Information System (SEVIS) number,<sup>2</sup> or unexpired foreign passport number), first and last name, date of birth, passport country of issuance, and the benefit that the applicant is seeking. Using the information the user agency provides, SAVE begins the verification process. SAVE relies on the Verification Information System (VIS), the underlying information technology platform that maintains data from various U.S. Government databases and functions, to query DHS and other federal databases for records that match the benefit applicant's information.<sup>3</sup>

The SAVE verification process includes the following steps:

1. **Initial Verification:** The user agency submits an initial request based on the information provided by the applicant. The initial verification electronically compares information the user agency enters against DHS-accessed databases and returns a response within seconds. If a match is found, the response contains the individual's current citizenship and immigration status. If the applicant's citizenship and immigration status is confirmed, the verification process is complete. If a match is not possible, the user agency receives a response to institute additional verification (also referred to as "second step"). The user agency must

---

<sup>2</sup> The Student and Exchange Visitor Information System (SEVIS) is a web-based system for maintaining information on international nonimmigrant students and exchange aliens in the United States. The SEVIS number is issued to students for status verification purposes. For more information on SEVIS, please see DHS/ICE/PIA-001 Student and Exchange Visitor Information System (SEVIS), available at <https://www.dhs.gov/publication/dhsicepia-001-student-exchange-visitor-information-system-sevis>.

<sup>3</sup> For a list of data sources that VIS uses, see DHS/USCIS-004 Systematic Alien Verification for Entitlements Program System of Records, 85 FR 31798 (May 27, 2020).



click the “institute additional verification” button to begin the additional verification process. It does not occur automatically.

2. **Additional Verification:** The user agency has the option to submit additional information and/or attach a copy of the applicant’s immigration documents to initiate a second step verification. Once the user agency submits the additional information (or submits the request without any additional information) for second level verification, a USCIS status verifier conducts an electronic or manual search of DHS databases, including databases not automatically searchable during the initial step. Within three (3) to five (5) federal working days, SAVE will return the applicant’s status. If verification is still not possible, the system prompts the user agency to “Resubmit with Docs” and provide copies of the immigration document the applicant presented.
3. **Third Level Verification:** The third step of the SAVE verification process requires the user agency to scan and upload a copy of the applicant’s immigration document, if not already provided during the additional verification step, to the Status Verification Operations Office to initiate a third level verification.

## Reason for the PIA Update

USCIS is updating DHS/USCIS/PIA-006 and its subsequent updates to account for the following changes related to SAVE:

1. A new information collection about actions that agencies adjudicating federal means-tested public benefits take to deem sponsor income as part of applicant income for purposes of federal means-tested benefits eligibility and to seek reimbursement from sponsors for the value of benefits provided to sponsored applicants.
2. The use of the Person Centric Entity Resolution microservice,<sup>4</sup> which is designed to improve accuracy and efficiency of the existing SAVE automated verification process to determine if the information supplied by the user agency matches an identity in existing USCIS, DHS, and external source systems.
3. VIS migrated to a cloud-hosted environment.
4. SAVE transitioned from the paper Form G-845, *Verification Request* to a paperless, electronic process.
5. Use of information from SAVE in administering bonds posted as security for performance and fulfillment of the financial obligations of a bonded alien (someone who is not a U.S.

---

<sup>4</sup> A microservice is an approach to application development in which a large application is built as a suite of modular services. Each module supports a specific business goal and uses a simple, well-defined interface to communicate with other sets of services.



Citizen) to the U.S. Government.

### ***Sponsor Deeming and Agency Reimbursement Information Collection***

Section 212(a)(4) of the Immigration and Nationality Act (INA), 8 U.S.C. § 1182(a)(4) requires some immigrants who seek Lawful Permanent Resident (LPR) status to provide a Form I-864 or Form I-864EZ, *Affidavit of Support Under Section 213A of the INA*, referred to hereinafter as “Form I-864,” executed by a sponsor. In certain cases, such as when a joint sponsor is needed, the intending immigrant may have more than one sponsor execute a Form I-864. In general, a sponsor must demonstrate that he or she can provide support to maintain the intending immigrant at an income of no less than 125 percent of the Federal Poverty Guidelines calculated based on the sponsor’s household size during the period in which the Form I-864 is enforceable. Sponsors must sign the legally enforceable Form I-864, under which the sponsor agrees to assume financial support for the sponsored immigrant as well as liability for reimbursing the cost of any means-tested public benefits provided to the sponsored immigrant during the period in which the Form I-864 is enforceable. Sponsors can also include the income and assets of spouses or other eligible members of the sponsor’s household if the household members execute a Form I-864A, *Contract Between Sponsor and Household Member*.

In determining a sponsored immigrant’s eligibility for, and the amount of, any federal means-tested public benefits, the income and resources of any sponsor who executed a Form I-864 and any household member who executed a Form I-864A must be counted “notwithstanding any other provision of law,” in accordance with 8 U.S.C. § 1631(a). Federal and state agencies administering federal means-tested public benefits refer to the counting of a sponsor’s income and resources in determining an immigrant’s eligibility as “deeming” – *i.e.*, a sponsor’s income and resources are said to be deemed to be income of the sponsored immigrant. State agencies have the responsibility to make determinations for exceptions to the sponsor deeming requirements. Benefit-granting agencies collect information about sponsor income and resources, as appropriate, in order to make accurate benefit award and deeming determinations.

Section 213A of the INA, 8 U.S.C § 1183a, also authorizes states to recover the costs of means-tested public benefits provided to sponsored immigrants from sponsors who have signed a Form I-864, or from household members who executed a Form I-864A, during the time period that the respective forms are in effect. In pursuing reimbursement of benefits from an immigrant’s sponsor, states must follow the process set out by DHS regulations, which, in particular, permits agencies to request “information through the Systematic Alien Verification for Entitlement (SAVE) Program...to obtain the sponsored immigrant's current immigration or citizenship status or the name, Social Security number and last known address of a sponsor, substitute sponsor, or joint sponsor.” SAVE provides financial sponsor information through Form I-864 or Form I-864EZ and household member information through Form I-864A to SAVE user agencies that adjudicate one or more of the five federal means-tested public benefits: Medicaid, CHIP, TANF,



SNAP, and supplemental security income (SSI). SAVE provides this information which will enable deeming and reimbursement actions.

The five federal means-tested benefits are administered at the federal level as follows: (1) Health and Human Services, Centers for Medicare and Medicaid Services – Medicaid (HHS/CMS – Medicaid); (2) HHS/CMS – CHIP; (3) HHS, Administration for Children and Families – TANF (HHS/ACF – TANF); (4) U.S. Department of Agriculture, Food and Nutrition Service – SNAP (USDA/FNS – SNAP); and (5) Social Security Administration SSI (SSA – SSI). SSA adjudicates SSI applications. State agencies under federal rules adjudicate the four other federal means-tested benefits (i.e., SNAP, TANF, CHIP, and Medicaid).

Although SAVE provides citizenship and immigration status information to approved and configured user agencies, SAVE currently does not collect benefit determination information. In particular, when SAVE provides immigrant sponsorship information to user agencies for deeming and reimbursement processes governed by the INA, Section 213A, 8 C.F.R. 213a, and other federal rules, SAVE does not currently prompt a response from those agencies as to their use of that information in determining the benefit. Because SAVE does not collect information regarding benefit determinations, the federal government currently has little visibility into whether and how benefit-granting agencies use the sponsor and household member information that SAVE provides for the deeming and reimbursement processes governed by INA, Section 213A, 8 CFR 213a, 8 U.S.C. 1631, and other federal laws, regulations, and guidance. SAVE also currently has limited visibility into whether benefit-granting agencies are following the terms of their MOA or CMA with SAVE and other SAVE rules in how they use Form I-864 sponsor and Form I-864A household member information. Furthermore, a Government Accountability Office (GAO) report observed that SAVE needs to improve the overall effectiveness of its monitoring and compliance activities.

The recent Presidential Memorandum (PM), *Memorandum on Enforcing the Legal Responsibilities of Sponsors of Aliens*, issued on May 23, 2019, placed a renewed focus on adequately enforcing reimbursement and deeming requirements, observing that “some agencies have insufficient procedures and guidance for implementing these reimbursement and deeming requirements of the immigration laws.”<sup>5</sup> The PM directed the Secretary of Homeland Security, in particular, to ensure that the agency efficiently and effectively establishes and maintains records regarding each financial sponsor’s reimbursement obligations and status. The PM further details requirements related to data collection when determining eligibility for certain sponsored immigrants who seek federal means-tested public benefits and directs federal agencies to take steps necessary to ensure compliance with requirements under the INA and other applicable federal

---

<sup>5</sup> See <https://www.whitehouse.gov/presidential-actions/memorandum-enforcing-legal-responsibilities-sponsors-aliens/>.



laws.

SAVE is amending its processes in response to the GAO report, the PM, and to help determine the extent to which benefit-granting agencies are complying with governing SAVE and federal deeming and reimbursement laws, rules, and regulations. When sponsorship information is provided to the user agency, SAVE will request the benefit-granting agency's final determination on adjudication of the federal means-tested public benefit. SAVE is requesting the collection of information regarding actions that agencies adjudicating federal means-tested public benefits take to (1) deem sponsor income as part of applicant income for purposes of federal means-tested benefits eligibility<sup>6</sup> and (2) seek reimbursement from sponsors for the value of benefits provided to sponsored applicants. The information may include:

- Whether the benefit-granting agency approved or denied the application for the means-tested public benefit;
- If the benefit-granting agency denied the application, whether the denial was based upon the information that SAVE provided in its response to the citizenship and immigration status verification request from the benefit-granting agency;
- Whether the benefit-granting agency deemed sponsor/household member income and, if not, the exception or reason for not doing so;
- Whether the benefit-granting agency sent the sponsor a reimbursement request letter (yes/no);
- Whether the sponsor complied with his or her reimbursement obligation; and
- Whether the benefit-granting agency conducted a collection action or other proceeding if the sponsor did not comply with his or her reimbursement obligation (yes/no and if yes, the status, court or forum, and docket or matter number).

This information will provide greater visibility into whether and how benefit-granting agencies use the sponsor and household member information that SAVE provides for the deeming and reimbursement processes.

SAVE will request and collect sponsor deeming and agency reimbursement information for each case that it provides sponsor information as part of the SAVE response. SAVE plans to collect this data for each case in which SAVE provides Form I-864 sponsor information. The information collection and maintenance will be day-forward, for federal means-tested public

---

<sup>6</sup> Under Section 421 of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (8 U.S.C. 1631), agencies adjudicating federal means-tested public benefits must consider ("deem") the income and assets of a qualified sponsor who has completed a Form I-864 or Form I-864EZ, *Affidavit of Support* (collectively referred to herein as a "Form I-864"), or a qualified household member who has completed a Form I-864A, *Contract Between Sponsor and Household Member*, as available to the sponsored benefit applicant in determining whether he or she is eligible for certain federal means-tested public benefits.



benefit applications adjudicated (e.g., approved, denied) on or after the date the benefit-granting agency begins providing sponsor deeming and reimbursement data to SAVE. SAVE will not collect information for federal means-tested public benefit applications the benefit-granting agency approves prior to that date.

Some state health care agencies submit immigration status requests to and receive responses from SAVE through the Health and Human Services, Centers for Medicare and Medicaid, Federal Data Services Hub Verify Lawful Presence service (VLP service). Responses through the VLP service sometimes include sponsor information. The sponsor deeming and agency reimbursement information collection functionality will not be available through the VLP service. Therefore, for agencies that are participating in the information collection and receive sponsor information for a SAVE case through the VLP service, SAVE will create and place a derivative copy of the subject case in a separate account that the same user agency may use to connect directly with SAVE. The agency will then provide the sponsor deeming and agency reimbursement information collection using the derivative case rather than the original case transmitted through the VLP service. If an agency does not already have a separate account for connecting directly to SAVE, SAVE will create one for that agency, which will include the agency signing a Memorandum of Agreement with SAVE if they do not already have one.

SAVE will now have greater visibility into whether and how benefit-granting agencies use the sponsor and household member information that SAVE provides for the deeming and reimbursement processes. SAVE will also have greater visibility into whether benefit-granting agencies are following the terms of their MOA or CMA with SAVE and other SAVE rules in how the benefit-granting agency uses Form I-864 sponsor and Form I-864A household member information.

With this information, USCIS intends to compile and make reports available to federal means-tested public benefit agencies that perform oversight, monitoring, and compliance activities regarding federal deeming and reimbursement rules. These reports will consist of general statistics in addition to case-specific information (which will include PII related to applicants who apply for the federal means-tested benefit that the agency oversees), so that federal means-tested public benefit oversight and administrative agencies can see individual cases that did not complete sponsor deeming and/or those cases where the benefit was not provided due to deeming. These reports will also be made available to the Department of Justice and the Department of Treasury, as necessary and authorized by law, and in coordination with the federal means-tested public benefit agencies for reimbursement activity. USCIS will further provide access, as appropriate and at USCIS's discretion, to relevant reports to approved adjudicating SAVE user agencies to assist them in managing their SAVE cases and monitoring their own compliance with SAVE program rules and the federal deeming and reimbursement rules.



## *Person Centric Entity Resolution Microservice*

USCIS is developing the Person Centric Services (PCS) in order to move USCIS towards the person-centric approach.<sup>7</sup> PCS is a series of microservices, which are integrated within existing USCIS systems to improve how USCIS handles, stores, and leverages person-centric data by providing personnel and systems with a repository of highly reliable and complete person records. PCS will support the management of the identities of USCIS customers by performing data analysis using the available data and the resolution of identities across systems. PCS provides highly reliable person identities for the USCIS applicants and petitioners that facilitate identity management services. PCS will be implemented in incremental phases. One of the first microservices to deploy is the Person Centric Entity Resolution microservice as an enhancement to SAVE.

The Person Centric Entity Resolution microservice is designed to improve accuracy and efficiency of the SAVE automated verification process for comparing data supplied by the user agency to what exists in USCIS, DHS, and external systems in order to determine an applicant's citizenship and immigration status. The former verification process for VIS was a distributed architecture in which VIS aggregated and compared data from multiple systems for SAVE and relied on the receipt of nightly downloads of data. If any of the systems used by SAVE were down, cases were sent to the Status Verification Operations Office to manually validate information against multiple DHS-accessed systems.

With the implementation of the Person Centric Entity Resolution microservice, SAVE relies on the microservice as a single source. The Person Centric Entity Resolution microservice improves how SAVE verifies citizenship and immigration status by reconciling data in a new, highly optimized manner. Instead of VIS relying on individual systems for each citizenship and immigration status verification case, VIS interfaces with the Person Centric Entity Resolution microservice as a single source to automatically compare the data provided by the user agency against the same USCIS, other DHS, and external system data sets for the automated verification process. This results in faster response times to user agencies and a reduction of the number of second step additional verifications;<sup>8</sup> and therefore, a reduction in the number of third level verifications. By leveraging this improved data, SAVE can quickly deliver more accurate results to user agencies.

SAVE's use of the Person Centric Entity Resolution microservice does not change the overall citizenship and immigration status verification process for USCIS or the user agency. The Person Centric Entity Resolution microservice supporting SAVE continues to access the same data

---

<sup>7</sup> The forthcoming Person Centric System PIA will be available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

<sup>8</sup> Additional verification is necessary in some instances where status cannot be verified through the first step. This does not mean that the applicant is not authorized to be in the United States, or is ineligible to receive the benefit. A second step verification query may take up to three (3) – five (5) working days to generate a response.



from the same systems as VIS. However, the Person Centric Entity Resolution microservice now retrieves that information through a direct connection to USCIS source systems, as well as through the Enterprise Citizenship and Immigrations Services Centralized Operational Repository (eCISCOR)<sup>9</sup> and Enterprise Service Bus 2 (ESB 2).<sup>10</sup> The Person Centric Entity Resolution microservice retrieves, consolidates, and caches data from the following systems on a daily basis:

## USCIS Systems

- Customer Profile Management System (CPMS)<sup>11</sup>
- USCIS Electronic Immigration System (USCIS ELIS)<sup>12</sup>
- Central Index System (CIS 2)<sup>13</sup>
- Computer-Linked Application Information Management System 4 (CLAIMS 4)<sup>14</sup>
- Global (not an acronym)<sup>15</sup>

The following systems send information via eCISCOR:

- Computer-Linked Application Management Information System 3 (CLAIMS 3)<sup>16</sup>
- Reengineered Naturalization Application Casework System (RNACS)<sup>17</sup>
- RAILS (not an acronym)<sup>18</sup>

---

<sup>9</sup> See DHS/USCIS/PIA-023(a) Enterprise Citizenship and Immigrations Services Centralized Operational Repository (eCISCOR), available at <https://www.dhs.gov/publication/dhs-uscis-pia-023a-enterprise-citizenship-and-immigrations-services-centralized>.

<sup>10</sup> See DHS/USCIS/PIA-008(a) Enterprise Service Bus, available at <https://www.dhs.gov/publication/dhsuscispia-008-enterprise-service-bus-2-esb-2>.

<sup>11</sup> See DHS/USCIS/PIA-060 Customer Profile Management Service (CPMS), available at <https://www.dhs.gov/publication/dhsuscispia-060-customer-profile-management-service-cpms>.

<sup>12</sup> See DHS/USCIS/PIA-056 USCIS ELIS, available at <https://www.dhs.gov/publication/dhsuscispia-056-uscis-electronic-immigration-system-uscis-elis>.

<sup>13</sup> See DHS/USCIS/PIA-009(a) Central Index System (CIS), available at <https://www.dhs.gov/publication/dhsuscispia-009-central-index-system>.

<sup>14</sup> See DHS/USCIS/PIA-015 Computer Linked Application Information Management System (CLAIMS 4), available at <https://www.dhs.gov/publication/dhsuscispia-015b-computer-linked-application-information-management-system-4-claims-4>.

<sup>15</sup> See DHS/USCIS/PIA-027(c) USCIS Asylum Division, available at <https://www.dhs.gov/publication/dhsuscispia-027b-refugees-asylum-and-parole-system-and-asylum-pre-screening-system>.

<sup>16</sup> See DHS/USCIS/PIA-016(a) CLAIMS 3 and Associated Systems, available at <https://www.dhs.gov/publication/dhsuscispia-016-computer-linked-application-information-management-system-claims-3-and>.

<sup>17</sup> RNACS decommissioned data is available in eCISCOR. See DHS/USCIS/PIA-023(a) Enterprise Citizenship and Immigrations Services Centralized Operational Repository (eCISCOR), available at <https://www.dhs.gov/publication/dhs-uscis-pia-023a-enterprise-citizenship-and-immigrations-services-centralized>.

<sup>18</sup> RAILS is only used for assistance in linking consolidated A-Numbers and links between A-Numbers and Receipt numbers. No biographic information is contained in this system, and no data from RAILS is directly passed to



## DHS Systems *Customs and Border Protection (CBP)*

- Arrival and Departure Information System (ADIS)<sup>19</sup>
- Nonimmigrant Information System (NIIS)<sup>20</sup>

## External Systems via USCIS ESB 2

- Department of Justice (DOJ) Executive Office for Immigration Review (EOIR) Immigration Retrieval and Information Exchange System (IRIES)<sup>21</sup>

Under the enhanced verification process, when SAVE verifies an individual's citizenship and immigration status, VIS communicates with the Person Centric Entity Resolution microservice to instantaneously access the same data from all systems as opposed to checking each system one by one for a match. The Person Centric Entity Resolution microservice then applies algorithms to determine a match confidence level, which is a measurement of the level of confidence in the match between the information submitted by the user agency and the information received from the data sources. The Person Centric Entity Resolution microservice algorithms enable the resolution and aggregation of multiple un-linked identity records (and associated data) to form a singular, comprehensive, and high-confidence view of an individual; thus, making the citizenship and immigration status verification matching process more reliable.

Additionally, because the Person Centric Entity Resolution microservice caches<sup>22</sup> all the necessary data, SAVE has a reduced dependency on other systems' availability. SAVE's use of the Person Centric Entity Resolution microservice has significantly improved SAVE reliability and speed by accessing the same data from all USCIS, DHS, and external systems instantaneously (as the systems can be queried by the Person Centric Entity Resolution microservice at the same time) as opposed to checking each system one by one for a match. SAVE makes a more precise search since the Person Centric Entity Resolution microservice associates the data it has queried from USCIS, DHS, and external source systems in a way to make the citizenship and immigration status verification process more accurate.

---

SAVE users or to VIS. RAILS can be used by USCIS employees to find the A-Files. *See* DHS/USCIS/PIA-075 RAILS, available at <https://www.dhs.gov/publication/dhsuscispia-075-rails>.

<sup>19</sup> *See* DHS/CBP/PIA-016 I-94 Website Application and DHS/CBP/PIA-024 Arrival and Departure Information System, available at <https://www.dhs.gov/publication/us-customs-and-border-protection-form-i-94-automation> and <https://www.dhs.gov/publication/arrival-and-departure-information-system>.

<sup>20</sup> NIIS is a subsystem housed on the CBP TECS platform; *see* DHS/CBP/PIA-021 TECS System: Platform (August 2016), available at <https://www.dhs.gov/publication/dhscbppia-021-tecs-system-platform>.

<sup>21</sup> *See* Case Access System for EOIR (CASE), available at [www.justice.gov/opcl/doj-privacy-impact-assessments](http://www.justice.gov/opcl/doj-privacy-impact-assessments).

<sup>22</sup> Note that "caching" does not introduce a new lag in the data because the data are being replicated in real-time from the same sources, or VIS is receiving the data faster because nightly (24 hour delayed refresh) processes are eliminated by direct interfaces.



## *Migration to Cloud-based Platform*

USCIS is undergoing a system modernization effort.<sup>23</sup> To support this modernization effort, USCIS is shifting away from traditional Data Centers to the use of third-party cloud-hosted environments. USCIS migrated VIS to the Amazon Web Services (AWS) cloud platform. This migration does not impact the collection and use of PII in VIS. USCIS requires AWS to segregate VIS data from all other third-party data. All existing records from VIS were extracted from the legacy database and transferred to the new cloud environment. This technological advancement does not affect the collection and use of records in VIS but modifies the way USCIS stores and maintains records related to SAVE as further discussed in the Auditing and Accountability section of this PIA.

## *SAVE Paperless Processing*

SAVE has transitioned from the paper Form G-845, Verification Request, to an essentially paperless, electronic process. The SAVE paperless initiative is part of a larger effort by USCIS to eliminate paper-based forms, as the agency transitions to online submission of benefit requests. Transitioning to a paperless process will eliminate 170,000 paper form submissions and returned responses annually, reducing resource costs and postal fees. The paperless initiative does not include creating an electronic Form G-845 as user agencies will now electronically submit the required information through SAVE instead of a paper-based form.

As stated previously, if SAVE is unable to locate a record pertaining to the applicant, the user agency is able to initiate additional verification. If the second step search produces relevant information enabling verification of citizenship and immigration status, SAVE provides an electronic notice to the user agency. However, if SAVE is still unable to locate a record for the applicant during the second step, SAVE electronically requests the user agency to submit a copy of the applicant's immigration documents for a third step search. Previously, user agencies had the option to mail in the Form G-845. Through SAVE modernization, all citizenship and immigration status verification requests are now submitted, completed, and responses returned electronically. While there is no electronic Form G-845, user agencies can request the same information electronically using SAVE as they used to via the paper Form G-845. User agencies also scan and upload copies of the applicant's immigration document, as needed. The paperless process has decreased the time it takes for agencies to receive second and third-level verification responses, as the process is more streamlined and efficient.

SAVE still provides a paper-based verification method; however, it is only appropriate for agencies to use the paper-based Form G-845 in extraordinary situations as determined by SAVE. Submissions of paper-based Form G-845 verification requests without prior approval by SAVE

---

<sup>23</sup> USCIS is undergoing a system modernization effort to align with the Cloud Smart initiative. Cloud Smart is a new strategy for agencies to adopt cloud solutions that streamline transformation and embrace modern capabilities.



will be rejected. When approved, user agencies may submit a request to verify an applicant's citizenship and immigration status by mailing a Form G-845 with photocopies of the front and back of the applicant's immigration document(s) to a designated Status Verification Operations Office.

### *Administration of USCIS Bonds*

In certain cases where an alien is determined to be inadmissible, but is otherwise admissible, he or she may be admitted at the discretion of the Secretary of Homeland Security upon the giving of a suitable and proper bond.<sup>24</sup> USCIS uses the Form I-945, *Public Charge Bond* to collect information to provide for the posting, maintenance, cancellation, and breach determination of a bond, and for the associated financial management activities, including collection of unpaid monies, and the calculation, payment, and reporting of interest.<sup>25</sup> USCIS will only exercise this authority in the context of adjustment of status applications in cases where adjustment would otherwise be granted but for these grounds of inadmissibility.

USCIS will use information from SAVE as part of administering these bonds. Specifically, USCIS will use information from SAVE as a way of learning whether a bonded alien (i.e., the alien on whose behalf the bond has been posted) may have applied for and/or received certain public benefits, as defined in 8 CFR 212.21(b). An application for these public benefits is not an indication of a bond breach in and of itself, but acceptance of a public benefits for more than 12 months in the aggregate within any 36-month period (such that, for instance, receipt of two benefits in one month counts as two months), after the alien's adjustment of status until the bond is cancelled pursuant to 8 CFR 213.1(g), may constitute a breach.

If a bonded alien was the subject of a SAVE immigration status verification request for one or more public benefits, as defined in 8 CFR 212.21(b), during the governing time frame, SAVE will supply certain data to the USCIS ELIS-based repository of bond information. The data from SAVE will include agency name, type of benefit (i.e., Medicaid, SSI, etc.), and the benefit requestor's full name, date of birth, and immigration identifier (i.e., A-number or other numeric identifier that the requestor supplied to the benefit-granting agency). The data from SAVE will also include any available sponsor deeming and agency reimbursement information. USCIS personnel will then consult the USCIS ELIS-based repository in the course of determining whether a bond breach has occurred. SAVE will provide this data annually, whenever the bonded alien requests cancellation of their bond, and as otherwise needed for bond administration.

---

<sup>24</sup> INA 212(a)(4) and 213; and 8 CFR 103.6 and 213.1.

<sup>25</sup> <https://www.uscis.gov/i-945>.



## Privacy Impact Analysis

### Authorities and Other Requirements

The previously cited legal authority to operate SAVE has not changed with this update. SAVE itself is established, administered and operated pursuant to the Immigration Reform and Control Act of 1986, Pub. L. No. 99-603, 100 Stat. 3359, Part C, § 121(c) (Nov. 6, 1986), codified at 42 U.S.C. § 1320b-7(d)(3) and note, Section 102 of the Homeland Security Act of 2002, 6 U.S.C. § 112, and section 103 of the Immigration and Nationality Act, 8 U.S.C. § 1103, which vest the Secretary of Homeland Security with administration of the immigration and naturalization laws of the United States. SAVE and SAVE user agencies also verify citizenship and immigration status pursuant to the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Pub. L. No. 104-193, 110 Stat. 2105 (Aug. 22, 1996) (codified at 8 USC §§ 1621-1625); the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, Pub. L. No. 104-208, 110 Stat. 3009-546, § 642 (Sept. 30, 1996) (codified at 8 U.S.C. § 1373); the REAL ID Act of 2005, Pub. L. No. 109-13, 119 Stat. 231, 302 (May 11, 2005), as implemented by 6 C.F.R. 37.13(b)(1); the Patient Protection and Affordable Care Act, Pub. L. No. 111-148, 124 Stat. 119 at § 1411(a)(1) (Mar. 23, 2010), as amended by the Health Care and Education Reconciliation Act of 2010, Public Law 111-152, 124 Stat. 1029 (Mar. 30, 2010); and the FAA Extension, Safety and Security Act of 2016, Pub. L. No. 114-190, 130 Stat. 615, § 3405(d) (July 15, 2016). These authorities give USCIS the legal authority to operate a system for verification of citizenship and immigration status of individuals seeking government benefits. There is no change in the requirement that all user agencies participating in SAVE sign a MOA or CMA with SAVE.

SAVE collects and shares sponsorship information for sponsor deeming and agency reimbursement purposes under the authorities cited above and Section 213A of the Immigration and Nationality Act, Public Law 82-414, 66 Stat. 163 (1952), as amended, and 8 U.S.C. § 1631.

USCIS administers bond processes pursuant to Section 212(a)(4) and 213 of the Immigration and Nationality Act, as implemented in 8 CFR 103.6, 212.21 and 213.1.

The SAVE SORN,<sup>26</sup> continues to cover the collection, maintenance, and use of the information for the enhanced automated citizenship and immigration status verification process. A revised version of the SORN is being published concurrently with this PIA to expand the categories of records in the system to include information collected from benefit-granting agencies adjudicating federal means-tested public benefits about actions taken to deem sponsor income as part of applicant income for purposes of federal means-tested benefits eligibility and to seek reimbursement from sponsors for the value of benefits provided to sponsored applicants. The new collection of information is still compatible with the purpose of the SAVE SORN because the

---

<sup>26</sup> See DHS/USCIS-004 Systematic Alien Verification for Entitlements Program System of Records, 85 FR 31798 (May 27, 2020).



collection and use of information enhances the integrity of SAVE and improves these processes by providing visibility into whether and how benefit-granting agencies use the sponsor and household member information that SAVE provides for the deeming and reimbursement processes.

This update does not change the Authority to Operate (ATO) for VIS, the technology that supports SAVE. VIS was approved for operation on April 28, 2014, and is part of the Ongoing Authorization program. Ongoing Authorization requires VIS to be reviewed on a monthly basis to ensure compliance with security and privacy requirements in order to maintain its ATO.

The records schedule does not change with this update. The National Archives and Records Administration (NARA)-approved records retention and disposal schedule, N1-566-08-07, continues to cover SAVE records. VIS stores and retains records collected in the process of enrolling in SAVE and in verifying citizenship and immigration status for ten (10) years from the date of the completion of verification, unless the records are part of an ongoing investigation in which case they will be retained until completion of the investigation.

The Form G-845, *Verification Request*, is covered by the Paperwork Reduction Act, specifically, OMB Control number 1615-0101. Furthermore, USCIS is updating the Form G-845 supplement to add the new sponsor deeming and agency reimbursement information collection.

## **Characterization of the Information**

Collecting sponsor deeming and agency reimbursement information, including for purposes of administrating the bond process, is a new information collection for SAVE. The Person Centric Entity Resolution microservice, VIS migration, and transition to paperless process enhancements do not impact the data elements collected for SAVE. The same information will continue to be used to verify citizenship and immigration status; however, data will be accessed differently through the use of the Person Centric Entity Resolution microservice.

## ***Sponsor Deeming and Agency Reimbursement Information Collection***

The information collected from the benefit-granting agency about actions that an agency adjudicating federal means-tested public benefits takes to deem sponsor income as part of applicant income for purposes of federal means-tested benefits eligibility and to seek reimbursement from sponsors for the value of benefits provided to sponsored applicants may include:

- Whether the benefit-granting agency approved or denied the application for the means-tested public benefit;
- If the benefit-granting agency denied the application, whether the denial was based upon the information that SAVE provided in its response to the citizenship and immigration status verification request from the benefit-granting agency;



- Whether the benefit-granting agency deemed sponsor/household member income and, if not, the exception or reason for not doing so;
- Whether the benefit-granting agency sent the sponsor a reimbursement request letter (yes/no);
- Whether the sponsor complied with his or her reimbursement obligation; and
- Whether the benefit-granting agency conducted a collection action or other proceeding if the sponsor did not comply with his or her reimbursement obligation (yes/no and if yes, the status, court or forum, and docket or matter number).

**Privacy Risk:** There is a risk that USCIS collects sponsor deeming and agency reimbursement information for SAVE cases that do not involve a federal means-tested public benefit.

**Mitigation:** This risk is mitigated. SAVE does not provide sponsor information and will not offer the option to provide sponsor deeming and agency reimbursement information for cases that do not involve a federal means-tested public benefit.

**Privacy Risk:** There is a risk of an over collection of information.

**Mitigation:** This risk is mitigated. The process of collecting information related to deeming will start with a threshold question of how the agency adjudicated the application for the benefit. If the agency denied the application, the agency will have an opportunity to select a reason why (i.e., deeming made them ineligible, immigration status made them ineligible, or another reason) and the information collection will stop at that point. If the agency approved the application, then SAVE will proceed with the rest of the information collection process. All questions related to the new information collection are narrowly scoped to relate to actions that agencies adjudicating federal means-tested public benefits take to deem sponsor income as part of applicant income for purposes of federal means-tested benefits eligibility and to seek reimbursement from sponsors for the value of benefits provided to sponsored applicants.

**Privacy Risk:** There is a risk that the user agency provides inaccurate sponsor deeming and agency reimbursement information.

**Mitigation:** This risk is mitigated. USCIS collects sponsor deeming and agency reimbursement information directly from the user agency so that the most current and accurate information about these processes is provided to USCIS. However, if the user agency provides inaccurate information, it would not affect the applicant's immigration benefit requests that are approved or pending. In this regard, bonded aliens and benefit applicants are afforded opportunities for records correction with respect to the accuracy of application documents submitted to USCIS and benefit granting agency, respectively, to ensure the accuracy of information submitted in these processes. For sponsor deeming and agency reimbursement processes, sponsors are required by 8



CFR 213a.3 to update address information within 30 days of a change of address to ensure accurate information. The SAVE interface control agreement and user testing processes mitigate inaccurate data flows and other technical risks. Auditing and monitoring of reports and system use will ensure prompt identification and correction of inaccurate information.

**Privacy Risk:** There is a risk that, for SAVE cases in which a state health care agency receives sponsor information through the HHS-CMS VLP service, SAVE will expose unnecessary case information by placing derivative copies of these cases in the wrong agency account.

**Mitigation:** This risk is mitigated. SAVE will work with HHS-CMS and each agency participating in the information collection to mitigate this risk. Specifically, SAVE will ensure that each agency includes an identifier unique to itself as part of each SAVE case transmitted through the HHS-CMS VLP service, and that this identifier accurately maps to the separate account that the agency uses to connect directly with SAVE (“user agency account”). In addition, SAVE will use testing and other quality assurance measures to ensure the accuracy of this mapping and the consequent creation and placement of each derivative case in the correct user agency account.

### ***Person Centric Entity Resolution Microservice***

SAVE’s use of the Person Centric Entity Resolution microservice does not impact the collection of information or the sources of information for SAVE. The Person Centric Entity Resolution microservice accesses the same data from the same systems as SAVE currently does in order to verify citizenship and immigration status, but through a live feed from eCISCOR; direct connections to CPMS, USCIS ELIS, CIS 2, CLAIMS 4, and Global; and, through ESB 2. The Person Centric Entity Resolution microservice retrieves data from various USCIS source systems and then associates the data from those systems. In addition, it queries the same external systems that VIS does. This data is then used by SAVE instead of SAVE relying on data in its nightly feeds or having to go out to different systems.

The Person Centric Entity Resolution microservice retrieves and caches information from the source systems in near real-time. The Person Centric Entity Resolution microservice correlates multiple records belonging to one individual by using a strong matching algorithm that includes matching, for example, A-Number along with other biographic identifiers to determine a match confidence score. A match confidence score is a measurement of the level of confidence in the match between the information submitted by the user agency and the information received from the data source. Submissions that do not meet the match confidence threshold are routed to the SAVE manual resolution process.

The USCIS Status Verification Operations Office identifies inconsistencies between databases as part of the SAVE manual resolution process. If a discrepancy is encountered or if no record is found pertaining to an individual, status verifiers conduct a manual search of DHS-accessed databases to determine citizenship and immigration status. If possible, status verifiers



will verify the applicant's citizenship and immigration status and request an update to the database. The applicant may be referred to a local USCIS office or to the appropriate record holding agency to resolve discrepancies that cannot be clarified through database or record searches.

**Privacy Risk:** There is a risk that information retrieved via eCISCOR and ESB 2, as opposed to a direct interface between PCS and the other source systems, may experience a delay in time that could affect the accuracy of the information.

**Mitigation:** This risk is mitigated. USCIS mitigates this risk by ensuring that retrieval of data through eCISCOR and ESB 2 happens in real time despite occurring through an intermediary system. In addition, SAVE requires user agencies to submit a case for SAVE personnel to review through the additional verification process if the user agency or the benefit applicant disagrees with an initial immigration status verification response provided by SAVE.

### **Uses of the Information**

SAVE continues to check citizenship and immigration status for granting benefits, licenses, and other lawful purposes as described in the published SAVE PIA and subsequent updates.<sup>27</sup> The VIS migration and transition to paperless process enhancements do not add additional risks to uses of the information.

### ***Sponsor Deeming and Agency Reimbursement Information Collection***

SAVE will now receive the user agency's final determination of benefit eligibility for those agencies that adjudicate federal means-tested public benefits. SAVE will use the information collected to have greater visibility into whether and how benefit-granting agencies use the sponsor and household member information that SAVE provides for the deeming and reimbursement processes.

**Privacy Risk:** There is a risk that authorized user agencies could use the data for purposes inconsistent with the original collection.

**Mitigation:** This risk is mitigated. SAVE's comprehensive audit trail tracking and maintenance functionality mitigates the risk of unauthorized use. Audit measures track and store information on users who submit queries, including: when the query was processed; what the response was; who receives the response; and when SAVE receives the response. The audit logs restrict access based on user roles. USCIS externalized these logs from system administration access methods and protected them from modification. USCIS periodically reviews the audit logs for monitoring user activity.

---

<sup>27</sup> See DHS/USCIS/PIA-006, DHS/USCIS/PIA-006(a), and DHS/USCIS/PIA-006(b), available at <https://www.dhs.gov/publication/systematic-alien-verification-entitlements-save-program>.



USCIS requires all SAVE user agencies to abide by all security requirements as agreed to upon enrollment in SAVE through MOAs or CMAs and described in the published DHS/USCIS/PIA-006 and subsequent updates.<sup>28</sup> Attempts to evade the security controls can result in loss of access to SAVE.

### *Person Centric Entity Resolution Microservice*

The Person Centric Entity Resolution microservice enhancement brings greater accuracy and efficiency to the citizenship and immigration status verification process by allowing USCIS to compare the information provided by a user agency against existing USCIS, DHS, and external systems to determine if the information supplied by the user agency matches an identity in existing source systems. This update creates no increased privacy impact to use of the information.

### *Administration of Bonds*

USCIS will use SAVE information to administer bonds posted as security for performance and fulfillment of the financial obligations of a bonded alien (someone who is not a U.S. Citizen) to the U.S. Government. Specifically, USCIS will use information from SAVE as a way of learning whether a bonded alien may have applied for or received certain public benefits as defined in 8 CFR 212.21(b). An application for these public benefits is not an indication of a bond breach in and of itself, but acceptance of a public benefits for more than 12 months in the aggregate within any 36-month period (such that, for instance, receipt of two benefits in one month counts as two months), after the alien's adjustment of status until the bond is cancelled pursuant to 8 CFR 213.1(g), may constitute a breach.

If the bonded alien was the subject of a SAVE immigration status verification request for one or more public benefits as defined in 8 CFR 212.21(b) during the governing time frame, SAVE will supply certain data to the USCIS ELIS-based repository of bond information. The data from SAVE will include agency name, type of benefit (Medicaid, SSI, etc.), and the benefit requestor's full name, date of birth, and immigration identifier (i.e., A-number or other numeric identifier that the requestor supplied to the benefit-granting agency). The data from SAVE will also include any available sponsor deeming and reimbursement information. USCIS personnel will then consult the USCIS ELIS-based repository in the course of determining whether a bond breach has occurred. SAVE data will not be used for administrative (non-criminal) immigration enforcement purposes, such as certain bonds issued by DHS entities other than USCIS.

---

<sup>28</sup> See DHS/USCIS/PIA-006, DHS/USCIS/PIA-006(a), and DHS/USCIS/PIA-006(b), available at <https://www.dhs.gov/publication/systematic-alien-verification-entitlements-save-program>.



**Privacy Risk:** There is a risk that USCIS could use sponsor deeming and agency reimbursement data for purposes inconsistent with the original collection.

**Mitigation:** This risk is mitigated. USCIS will only use the information collected for the purposes detailed in the published SAVE PIAs and SORN, and only as approved by the Office of Management and Budget through the Information Collection Review process. All records will be protected from unauthorized access through appropriate administrative, physical, and technical safeguards that include restricting access to authorized personnel who have a need-to-know. USCIS will limit access to PII by employing role-based access (only allowing access to users who need particular PII to perform their duties). USCIS will also deploy user logs to ensure users are only accessing information related to their job functions.

SAVE's comprehensive audit trail tracking and maintenance functionality mitigates the risk of unauthorized use. Audit measures track and store information on users who submit queries, including: when the query was processed; what the response was; who receives the response; and when SAVE receives the response. The audit logs restrict access based on user roles. USCIS externalized these logs from system administration access methods and protected them from modification. USCIS periodically reviews the audit logs for monitoring user activity.

## Notice

This PIA update provides general notice to the public by describing the changes to SAVE and the information storage and maintenance practices by USCIS as data is migrated to the AWS public cloud platform. USCIS is also concurrently issuing a revised SAVE SORN<sup>29</sup> to cover the sponsor deeming and agency reimbursement information collection. USCIS continues to provide notice of these enhancements to SAVE user agencies through updated user manuals, SAVE newsletters, training, the SAVE log-in screen, and press releases on USCIS's website. Additionally, the MOAs between SAVE and user agencies require the user agencies to provide notice to the applicants, consistent with notice required by the Privacy Act, that informs applicants about how their information is used; that providing the information is voluntary; and the consequences of not providing the requested information. The USCIS Verification Division provides guidance to user agencies concerning notice to the applicants in the SAVE Program Guide and the agency SAVE Self-Assessment Guide.

**Privacy Risk:** There is a privacy risk that individuals providing information to USCIS will not be aware that their information is being stored on a server not owned or controlled by USCIS.

**Mitigation:** This risk is partially mitigated. This PIA update provides notice that information is stored in AWS, a commercial cloud-based system, and USCIS provides general notice to individuals about the collection and use of their information. USCIS, however, does not

---

<sup>29</sup> See DHS/USCIS-004 Systematic Alien Verification for Entitlements Program System of Records, 85 FR 31798 (May 27, 2020).



provide explicit notice at the time of collection that the information may be stored in a cloud-based system. Regardless of storage location of records, VIS records are governed by USCIS' collection, use, and dissemination of personally identifiable information and are required to meet all applicable federal security guidelines.

### **Data Retention by the Project**

This update does not change the length of time that SAVE-related data is retained in VIS. USCIS continues to adhere to the NARA-approved retention schedule, N1-566-08-07, for VIS. The SAVE-related records in VIS are retained for 10 years from the date of completion of the verification, unless the records are part of an ongoing law enforcement investigation, in which case records may be retained until completion of the investigation. This period is based on the statute of limitations for most types of misuse or fraud possible using SAVE (under 18 U.S.C. § 3291, the statute of limitations for false statements or misuse regarding passports, citizenship, or naturalization documents). There are no additional risks to data retention.

### **Information Sharing**

USCIS will continue to share and disclose SAVE information as outlined in the published DHS/USCIS/PIA-006 and subsequent updates.<sup>30</sup> USCIS will continue to share and disclose SAVE information with DHS components for law enforcement purposes when SAVE detects possible fraud and/or misuse, on a case-by-case basis. USCIS will also continue to share and disclose SAVE information externally for law enforcement purposes and to respond to federal, state, local, and tribal government agencies citizenship and immigration status queries.

### ***Sponsor Deeming and Agency Reimbursement Information Collection***

For federal means-tested public benefits, there is a change in the workflow as the SAVE case is not closed out when USCIS returns the citizenship and immigration status response. Once the benefit-granting agency makes a determination about the applicant's eligibility, the benefit-granting agency will go back into SAVE.

The process of collecting information related to deeming will start with a threshold question of how the agency adjudicated the application for the benefit. If the agency denied the application, the agency will have an opportunity to select a reason why (e.g., deeming made the individual ineligible, immigration status made the individual ineligible, or another reason) and the information collection will stop at that point. If the agency approved the application, then SAVE will proceed with the rest of the information collection process.

SAVE will create and share reports that include sponsor deeming and agency reimbursement information to both federal means-tested public benefit agencies as well as

---

<sup>30</sup> See DHS/USCIS/PIA-006, DHS/USCIS/PIA-006(a), and DHS/USCIS/PIA-006(b), available at <https://www.dhs.gov/publication/systematic-alien-verification-entitlements-save-program>.



oversight entities for monitoring and compliance activities. The reports shared with the federal means-tested public benefit agencies will include both PII and general statistics. The federal agencies will use case specific information (e.g., verification case number, name, date of birth, immigration status, benefit type) and statistical information (e.g., total of means-tested public benefits granted, how often the agency deemed the sponsor's income, if a deeming exception applied and a breakdown of which exceptions applied most often) to monitor agencies that administer the federal benefits to ensure they are following federal deeming and reimbursement rules and if adjustments need to be made. For example, HHS/CMS administers the nation's major healthcare programs like Medicaid and CHIP. However, state healthcare agencies are the entities that adjudicate healthcare benefit requests. HHS/CMS needs access to both PII and statistical information in order to properly monitor state agencies that use federal funds to grant benefits.

DHS/USCIS will further provide access to relevant reports to approved adjudicating SAVE user agencies to assist them in managing their SAVE cases and monitoring their own compliance with SAVE program rules and the federal deeming and reimbursement rules. User agencies will be able to run case-specific reports for quality assurance that will include information, such as: name, date of birth, type of benefit, immigration identifier (e.g., A-Number, passport number, I-94 Arrival/Departure Record), immigration status, if the benefit was administered, if the sponsor's income was deemed, etc. Users will also be able to run high-level reports to pull statistics indicating how many times the benefit-granting agency deemed the sponsor's income, how many cases did an exception apply, how many cases the sponsor repaid the government agency, etc. The reports will also be used to look for anomalies/patterns that could indicate the federal deeming/reimbursement rules are not being followed. USCIS may also indicate to agencies whether the sponsor may be fraudulent or otherwise ineligible to serve as a sponsor.

In addition, SAVE shares and will continue to share general information with oversight entities, such as the U.S. Government Accountability Office (GAO), Congress, DHS, and USCIS Headquarters, as needed and requested. The information shared will now include sponsor deeming and agency reimbursement information in order to verify that federal means-tested public benefit agencies are complying with federal deeming and reimbursement laws, rules and regulations. These reports may include information, such as how many means-tested benefits an agency granted, how many times the agency deemed the sponsor's income before granting the benefit, if a deeming exception applied and the specific exceptions applied most often, or how many cases the agency sent the sponsor a reimbursement request letter. Oversight entities may use this information to monitor if agencies are increasing their compliance with deeming and reimbursement requirements or if modifications need to be made.



**Privacy Risk:** There is a risk that data shared by USCIS with external partners will be used beyond the original purpose of collection (i.e., to assist user agencies in adjudicating benefits).

**Mitigation:** This risk is mitigated. All SAVE user agencies must adhere to a MOA or a CMA, which include binding responsibilities regarding proper information usage and handling of SAVE information. The MOAs and CMAs also contain specific requirements limiting use of SAVE-related information to those purposes set forth in the agreements. The agreements between USCIS and external entities fully outline responsibilities of the parties, security standards, and limits of use of the information. Use of SAVE is governed by need-to-know criteria that require the user agency demonstrate the need for the data before verification of citizenship and immigration status is provided.

**Privacy Risk:** There is a risk that the reports regarding federal deeming and reimbursement rules made available to the federal means-tested public benefit agencies for oversight purposes may result in unauthorized onward sharing.

**Mitigation:** This risk is mitigated. All user agencies who sign an MOA or CMA with USCIS to use SAVE agree to safeguard information provided by SAVE to ensure that the information is not used for any other purpose than described in the MOA or CMA and protect its confidentiality, which includes ensuring that the information is not disclosed to any unauthorized person(s) without the prior written consent of USCIS.

### ***Person Centric Entity Resolution Microservice***

SAVE's use of the Person Centric Entity Resolution microservice does not impact existing external sharing arrangements as described in the published DHS/USCIS/PIA-006 and subsequent updates.<sup>31</sup> The Person Centric Entity Resolution microservice retrieves, consolidates, and caches data from most of the external source systems through the ESB 2 in support of the automated verification process. The previous process required VIS, through the ESB 2, to send and retrieve the individual's biographic information from external source systems with each citizenship and immigration status verification request. This enhanced process no longer requires VIS to send individual requests to external source systems. The Person Centric Entity Resolution microservice retrieves and stores batched data from USCIS systems (via the ESB 2) on a daily basis to serve as the single, back-end repository. In addition, the Person Centric Entity Resolution microservice queries the same external systems that VIS directly queried.

---

<sup>31</sup> See DHS/USCIS/PIA-006, DHS/USCIS/PIA-006(a) and DHS/USCIS/PIA-006(b), available at <https://www.dhs.gov/publication/systematic-alien-verification-entitlements-save-program>.



## *Migration to Cloud-based Platform*

USCIS migrated VIS to the AWS cloud platform. This migration does not impact information sharing practices in VIS from the previous legacy system. USCIS requires AWS to segregate VIS data from all other third-party data. The cloud-hosted VIS system absorbed legacy VIS functionality and system interconnections.

## *SAVE Paperless Processing*

The paperless process that SAVE implemented does not impact information sharing practices as described in the SAVE Program PIAs. SAVE is not sharing data with any new user agency or entity as a result of the paperless rollout. User agencies can request additional information and securely scan and upload copies of immigration documents to SAVE, rather than through the mail.

## *Administration of Bonds*

The use of information from SAVE as part of administering bonds does not impact information sharing practices as described in the SAVE Program PIAs and SORN. USCIS will use information from SAVE to administer bonds posted as security for performance and fulfillment of the financial obligations of a bonded alien (someone who is not a U.S. Citizen) to the U.S. Government. Specifically, USCIS will use information from SAVE as an input for the process for determining whether the alien has violated the condition of the bond under which, if the alien receives any public benefits, as defined in 8 CFR 212.21(b), for more than 12 months in the aggregate within any 36 month period (such that, for instance, receipt of two benefits in one month counts as two months), after the alien's adjustment of status until the bond is cancelled pursuant to 8 CFR 213.1(g), the obligor or agent/co-obligor shall pay the entire amount of the bond as directed by DHS.

USCIS will use SAVE data elements such as name, date of birth, one or more immigration identifiers, and type of benefit to determine whether SAVE received an immigration status verification request about the bonded alien for a public benefit, as defined in 8 CFR 212.21(b), within the governing time period. In addition, SAVE will supply available information about receipt of benefits supplied by the user agencies. This information from SAVE may indicate that the bonded alien may have received such benefit and thus breached this condition of the bond. In this situation, USCIS will obtain additional evidence from the bonded alien and/or other entities to determine whether the bonded alien received the public benefit.

**Privacy Risk:** There is a risk that benefit applicants whose information is verified through SAVE may not be aware that USCIS will use SAVE information to administer bonds.



**Mitigation:** USCIS has mitigated this risk through the publication of the PIA, SORN, and any additional notices published on the USCIS website and/or by the benefit granting agency.

## **Redress**

This update does not impact how access, redress, and correction may be sought through USCIS. There are no changes to the access, redress, and corrections procedures identified in the published DHS/USCIS/PIA-006 and subsequent updates.<sup>32</sup> This update creates no increased privacy impact.

The user agency is able to correct information within SAVE. The user agency submits an initial request based on the document or information provided by the applicant. Within seconds, SAVE returns the applicant's status or prompts the user agency to "Institute Additional Verification." Additional verification procedures provide an opportunity for a thorough check of the applicant's records.

USCIS also continues to provide individuals with access to their information through a Privacy Act or Freedom of Information Act (FOIA) request. Individuals not covered by the Privacy Act or Judicial Redress Act (JRA) still may obtain access to records consistent with FOIA unless disclosure is prohibited by law or if the agency reasonably foresees that disclosure would harm an interest protected by an exemption. U.S. citizens and Lawful Permanent Residents may also file a Privacy Act request to access their information. If an individual would like to file a Privacy Act or FOIA request to view his or her USCIS records, the request can be mailed to the following address:

National Records Center  
Freedom of Information Act/Privacy Act Program  
P. O. Box 648010  
Lee's Summit, MO 64064-8010

Persons not covered by the Privacy Act or JRA are not able to amend their records through FOIA. Should a non-U.S. person find inaccurate information in his or her records received through FOIA, he or she may visit a local USCIS Field Office to identify and amend inaccurate records with evidence.

## **Auditing and Accountability**

USCIS ensures that practices stated in this PIA comply with federal, DHS, and USCIS standards, policies, and procedures, including standard operating procedures, rules of behavior, and auditing and accountability procedures. VIS is maintained in the AWS, which is a public cloud designed to meet a wide range of security and privacy requirements (e.g., administrative, operational, and technical controls) that are used by USCIS to protect data in accordance with

---

<sup>32</sup> *Id.*



federal security guidelines.<sup>33</sup> AWS is Federal Risk and Authorization Management Program (FedRAMP)-approved and authorized to host PII.<sup>34</sup> FedRAMP is a U.S. Government-wide program that delivers a standard approach to the security assessment, authorization, and continuous monitoring for cloud services.

USCIS requires VIS to undergo the security assessment process to verify adherence to DHS privacy and security requirements. USCIS validates technical and security controls to preserve the confidentiality, integrity, and availability of the data during the security authorization process. These technical and security controls limit access to USCIS users and mitigates privacy risks associated with unauthorized access and disclosure to non-USCIS users. Further, DHS security specifications require auditing capabilities that log the activity of each user in order to reduce the possibility of misuse and inappropriate dissemination of information. All user actions are tracked via audit logs to identify information by user identification, network terminal identification, date, time, and data accessed. All USCIS systems employ auditing measures and technical safeguards to prevent the misuse of data.

All USCIS employees with access to VIS complete annual mandatory privacy awareness and Information Security training. These trainings present Privacy Act responsibilities and policies regarding security, sharing, and safeguarding of official information and PII on USCIS systems. The trainings are updated as appropriate, and all USCIS employees are required to take these trainings annually.

**Privacy Risk:** The data maintained by AWS for the purposes of cloud hosting may be vulnerable to breach because security controls may not meet system security levels required by DHS.

**Mitigation:** This risk is mitigated. USCIS is responsible for all PII associated with the VIS system, whether on a USCIS infrastructure or on a vendor's infrastructure, and it therefore imposes strict requirements on vendors for safeguarding PII data. This includes adherence to the DHS 4300A Sensitive Systems Handbook, which provides implementation criteria for the rigorous requirements mandated by DHS's Information Security Program.<sup>35</sup>

**Privacy Risk:** There is a risk that SAVE records can be accessed by unauthorized personnel since VIS resides in AWS, a public cloud.

---

<sup>33</sup> Public clouds are owned and operated by third-party service providers whereas private clouds are those that are built exclusively for an individual enterprise.

<sup>34</sup> See <https://marketplace.fedramp.gov/#/product/aws-us-eastwest?status=Compliant&sort=productName>.

<sup>35</sup> See <https://www.dhs.gov/publication/dhs-4300a-sensitive-systems-handbook>.



**Mitigation:** This risk is mitigated. Although VIS operates in a public cloud, VIS is separated from other public cloud customers. VIS operates in a Virtual Private Cloud, which is a private component to the public cloud. USCIS controls access to the systems within the cloud, not AWS.

## Responsible Official

Donald K. Hawkins  
Privacy Officer  
U.S. Citizenship and Immigration Services  
U.S. Department of Homeland Security  
(202) 272-8030

## Approval Signature

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

---

Dena Kozanas  
Chief Privacy Officer  
U.S. Department of Homeland Security  
(202) 343-1717