



**Privacy Impact Assessment Update
for the**

**U.S. Secret Service Electronic Name
Check System (eCheck)**

DHS/USSS/PIA-012(c)

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Abstract

The United States Secret Service (USSS) uses the Electronic Name Check System (eCheck) to assist with conducting and managing the results of background checks on prospective attendees requesting access to attend a National Special Security Event (NSSE). The system allows trained USSS personnel to electronically submit a request for information on a prospective NSSE attendee and receive results of his or her criminal status and history prior to granting access to an event. This PIA update is being completed to reflect an increase in functionality for USSS field offices when accessing the criminal status and personally identifiable information (PII) of self-identified foreign nationals. Criminal status and history information will continue to be verified and corroborated by the USSS professional agents when making a determination as to whether to grant or deny an individual access to an NSSE.

Overview

USSS is tasked by statute in the coordination of physical security for NSSEs and providing protection for the nation's highest leaders. The USSS Dignitary Protective Division (DPD) prevents and counters terrorist and criminal attacks that target large events and their attendees, which often include USSS protectees. DPD collects PII to assess the criminal history of potential attendees and make a security determination regarding whether to grant or deny them access to the events. Examples of attendees are members of the media, vendors, volunteers, drivers, and other specific individuals who require special access within a secured area of the NSSE or close proximity to it.

The eCheck System is an internal USSS database system with a web-based application used to facilitate investigation of individuals who have requested access to secured areas, or who may be in close proximity to persons protected by the USSS pursuant to the protection authorities in Title 18 U.S.C. 3056 and Title 3 U.S.C. 202.

Reason for the PIA Update

Historically, name checks have always included USSS systems such as the Field Investigative Reporting System (FIRS);¹ Federal Bureau of Investigation (FBI) and state/local criminal indices, National Crime Information Center (NCIC), National Law Enforcement Telecommunications System (NLETS); and immigration status checks with U.S. Immigration and Customs Enforcement (ICE). The eCheck System capability will now expand to provide USSS field offices a method to confirm criminal or unlawful presence as listed in ICE records via the Immigration Alien Query (IAQ).² USSS DPD staff system functionality will be the same, but the IAQ will enable the USSS field offices to directly and more efficiently submit queries about

¹ See DHS/USSS/PIA-009 Field Investigative Reporting System (FIRS), available at <https://www.dhs.gov/privacy>.

² For more information about the IAQ, please see DHS/ICE/PIA-020 Alien Criminal Response Information Management System, available at <https://www.dhs.gov/privacy>.



prospective attendees who have identified themselves as foreign nationals and receive results that identify whether the foreign national is under lawful investigation, such as an arrest warrant or a member of a terror watch list, as reported to the Law Enforcement Support Center (LESC).³ The results will allow USSS DPD to determine a prospective attendee's suitability to be granted entrance to an NSSE. Submission of requested data below is voluntary. Refusal to disclose a Social Security number (SSN) or citizenship will not be cause for denial of any right, benefit, or privilege provided by law. However, it should be noted that failure to provide any of the requested information may limit the completeness or accuracy of name checks, which could result in denial of access to secured areas protected by USSS.

In the new process, USSS field offices will enter the following information about the prospective attendee in an IAQ:

- Full Name;
- Date of Birth;
- Gender;
- Country of Birth;
- SSN or Passport Number and Country; and
- City and State of Residence/Visit Location.

The query request leaves the USSS network via the USSS Access National Crime Information Center (ACNIC) Server⁴ and is routed through the FBI Network. The query, along with information discussed in previous eCheck PIAs, is then routed to the following entities, and results can be returned to eCheck from one or all of three sources:

- (1) The National Crime Information Center (NCIC),⁵ which is the U.S. central database for tracking crime-related information and houses the FBI's criminal history files. It is maintained by the Criminal Justice Information Services Division (CJIS) of the FBI and is interlinked with federal, tribal, state, and local agencies and offices;
- (2) The National Law Enforcement Telecommunications System (NLETS),⁶ which is a secure private information sharing system with federal and international components for law enforcement agencies and routes the IAQ to ICE; and
- (3) The Law Enforcement Support Center (LESC), which is administered by ICE and is a single national point of contact that provides timely immigration status, identity

³ The LESC is a national enforcement operations facility administered by ICE.

⁴ ACNIC is a tool within the USSS Application Provisioning System that routes queries to outside agencies and returns responses to USSS.

⁵ See FBI-001, National Crime Information Center (NCIC), September 28, 1999, 64 FR 52343, available at <https://www.fbi.gov/services/information-management/foipa/fbi-privacy-act-systems/64-fr-52343>.

⁶ See <http://www.nlets.org/> for more information on NLETS.



information, and real-time assistance to local, state, and federal law enforcement agencies on aliens suspected, arrested, or convicted of criminal activity.

The immigration status determinations returned in response to the IAQ are used along with the other information returned by the various sources as part of the process of making a determination about whether or not to admit an individual to an NSSE, as described in the previous eCheck PIAs. The USSS agent performs follow-up actions with the subject and/or the information source before making a determination as to issuing credentials for entry to the NSSE.

Privacy Impact Analysis

Authorities and Other Requirements

In addition to the System of Records Notices (SORN) listed in the previous PIAs, eCheck is covered by DHS/USSS-004 Protection Information System.⁷ Information coming from the IAQ is covered by DHS/ICE-007 Criminal History and Immigration Verification (CHIVe) System of Records.⁸

Characterization of the Information

In addition to information listed in the previous PIAs, information queried in the updated IAQ includes:

- Full name;
- Date of birth;
- Gender;
- Country of birth;
- SSN or passport number and country;
- City and state of residence; and
- City and state of visit location.

The query is routed through to NCIC, NLETS, and LESC. For NCIC and NLETS, the information returned to USSS may include the following:

- Naturalization status;
- Immigration status;
- Criminal background;

⁷ DHS/USSS-004 Protection Information System, October 28, 2011, 78 FR 66940.

⁸ DHS/ICE-007 Criminal History and Immigration Verification (CHIVe) System of Records, May 8, 2018, 83 FR 20844.



- Arrest record;
- Driver's License Number;
- FBI Number;
- State Criminal ID Number;
- Alien Registration Number (A-Number); and
- Other Identifying Number.

For LESC, the information returned to DPD is a "hit" or "no hit" report that contains an ICE-assigned reference number and an ICE contact that USSS agents can use to follow up on the "hit" as they determine a prospective attendee's suitability to be granted or denied entrance to an NSSE. Once USSS agents follow up with the "hit," they may find criminal concerns, such as appearance on a terror watch list or unlawful presence in the country.

The results of the IAQ are checked by USSS personnel and compared with the prospective attendee's full name, date of birth, and either SSN or passport number to verify that the results returned match the person being queried. A request for access to an NSSE will not be granted unless these pieces of data are an accurate match of the prospective attendee. USSS agents perform corroborative actions with the subject and/or the information source before making a determination as to issuing credentials for entry to the NSSE.

Privacy Risk: There is a risk that inaccurate information on individuals who are subjects of an IAQ may be collected and maintained.

Mitigation: This risk is mitigated. Trained USSS personnel review all information collected from the queried database sources as part of the eCheck process using investigative and analytic techniques that focus on the review of data in order to verify its accuracy. Any information that appears inaccurate is flagged and further checked for accuracy. This information will be verified and corroborated by the USSS professional agents.

Privacy Risk: There is a risk that eCheck may collect more information than is necessary for or relevant to granting approval to a prospective attendee.

Mitigation: USSS collects information as part of the eCheck process in order to identify threats or potential threats to the safety of individuals, events, and facilities protected by USSS and to perform checks to determine if individuals can be admitted to a NSSE. All information collected is reviewed by trained USSS personnel. Information deemed unnecessary is not processed.

Uses of the Information

The information gathered will continue to be used to determine whether a prospective NSSE attendee can be granted access to an event. USSS does not provide information back to ICE or use the information in any way other than to determine admittance to the events.



Notice

Individuals seeking to attend an NSSE are required to complete a form. This form provides notice that the individual will be undergoing an evaluation to determine whether he or she is eligible to enter the event. General notice that USSS collects information to determine whether to grant access to NSSEs is provided by DHS/USSS-004 Protection Information System of Records Notice.⁹ It provides notice regarding the collection of information and the routine uses associated with the collection of the information. Additionally, this PIA provides notice to a foreign national applying to attend an NSSE that a background investigation will be conducted during the application process.¹⁰

Data Retention by the project

There has been no change to retention with this update.

Information Sharing

There is no change to the information sharing process with this PIA update.

Redress

Access, redress, and correction have not changed with this update. Any individual seeking to contest or appeal his or her denial of entry should notify his or her application point-of-contact (POC)¹¹ and the request would be routed through USSS for review and possible reconsideration. eCheck is not a provider of the information collected and therefore correcting erroneous information is beyond its scope. Information about access, redress, and corrections can be found in the DHS/USSS-004 Protection Information System SORN¹² and DHS/ICE-007 Criminal History and Immigration Verification (CHIVE) System of Records SORN.¹³

Auditing and Accountability

The system will continue to take all necessary measures to ensure that the information stored within is used in accordance with the stated practices in this PIA update. All USSS information systems are audited regularly to ensure appropriate use of and access to information. eCheck supports routine audit logging and monitoring and unusual user activity is investigated.

⁹ DHS/USSS-004 Protection Information System, October 28, 2011, 76 FR 66940.

¹⁰ For more information about the eCheck application process, please *see* DHS/USSS/PIA-012(b) eCheck, available at <https://www.dhs.gov/privacy>. This PIA discusses that prospective event applicants are provided with a web address to initiate the online application and notified of the background check process.

¹¹ POCs are chosen by the entities whose personnel or affiliates are seeking a credential. For example, multiple POCs may be identified to facilitate credentials for members of the media, local law enforcement, and safety personnel. Individual applicants may only access their own information. POCs may only access information related to their own applicants. For more information about POCs and the application process, please *see* DHS/USSS/PIA-012(b) eCheck, available at <https://www.dhs.gov/privacy>.

¹² DHS/USSS-004 Protection Information System, October 28, 2011, 78 FR 66940.

¹³ DHS/ICE-007 Criminal History and Immigration Verification (CHIVE) System of Records, May 8, 2018, 83 FR 20844.



All USSS employees are required to receive annual privacy and security training to ensure their understanding of proper handling and securing of PII. DHS has published the “Handbook for Safeguarding Sensitive PII,” providing employees and contractors additional guidance.

DHS physical and information security policies dictate who may access USSS computers and filing systems. Specifically, DHS Management Directive 4300A outlines information technology procedures for granting access to USSS computers. Access to the information is strictly limited by access controls to those who require it for completion of their official duties.

Responsible Official

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Approval Signature

[Original signed and on file with the DHS Privacy Office]

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