Privacy Impact Assessment Update
for the

Global Enrollment System

November 1, 2006

Contact Point
Sandra Faye Scott
Office of Field Operations
U.S. Customs and Border Protection
(202) 344-2548

Reviewing Official
Hugo Teufel III
Chief Privacy Officer
Department of Homeland Security
(571) 227-3813
Abstract

This is an update to the previous Global Enrollment System privacy impact assessment, dated April 20, 2006, in order to describe the new online application process, Global On-Line Enrollment System, for enrollment in Customs and Border Protection trusted traveler programs. With this update, CBP will be able to offer an online enrollment process to prospective and existing members of GES programs.

Introduction

U.S. Customs and Border Protection (CBP), a component within the Department of Homeland Security (DHS), currently operates different trusted traveler programs at designated border ports of entry to expedite the processing of pre-approved, international, low-risk travelers effectively and efficiently through the border.

This PIA covers the rollout of the Global On-Line Enrollment System (GOES). GOES will allow prospective and existing members of GES trusted traveler programs to apply for and check status of enrollment via a secure website.

An applicant interested in using the online application will visit the CBP website and choose the particular program of interest (NEXUS, SENTRI, FAST, US PASS). The applicant will review the trusted traveler program requirements prior to applying to the program. After reviewing the requirements, the applicant will click on the GOES web link. The applicant will provide the identical biographic data as is presently required for the paper application. The applicant has the option to provide an email address in order to receive username information via email and be notified via email when new information concerning the applicant is on GOES. In addition, the applicant will be asked to provide answers to a set of security questions. The applicant’s answers will be maintained in GES and be used to verify access when an applicant has forgotten her username, password, or both. In those situations, a successful response to the security questions, the applicant will be required to set up a new password.

If a current member of any of the GES programs wishes to renew her application or apply for a different program, she will be asked to provide her membership identification number to retrieve application data from GES. A new applicant will be required to input all data required. Upon completion of the application, all applicants must go to Pay.gov to pay the application fee. Pay.gov will provide to CBP the tracking number and the amount paid. No credit card information will be collected or maintained by CBP.

Throughout the application process, GOES will provide the applicant with status and further instructions to finalize their enrollment. Applicants using GOES will receive instructions, such as setting up interviews, approval and denial letters only though GOES.
Changes to GES

GOES, the front end online application of GES, will allow applicants to apply online for membership to trusted traveler programs. GOES is a fully automated application submission process that includes support for on-line payment processing for fee collection. GOES will collect the same information that is currently collected via the paper application. The applicant will provide the identical biographic data as is presently required for the paper application. In order to facilitate the online transaction, CBP will also collect answers to pre-determined security questions, Pay.gov’s tracking number and amount paid, and optionally email address.

Reason for Changes

This PIA update is required based on the pending implementation of the online application for GES. GOES will streamline that application process by allowing for an electronic enrollment process. It will make the information collection process more efficient and more accurate as it will be entered by the applicant and will no longer be “re-keyed” into GES. This will reduce the number of keystroke errors in the database thereby making it more accurate. Also hand written applications are often illegible and may be incorrectly transcribed into GES. Additionally, privacy is enhanced due to the fact that an individual processor, who does not have the ability to approve the application, is no longer required to see the personal information for its entry into GES.

Privacy Impact Analysis

Data Collection

As noted above, GOES will collect the identical information that is currently collected via the paper application process. In addition, the applicant will be asked to provide answers to a set of security questions. The applicant’s answers will be maintained in GES and be used to verify access when an applicant has forgotten her username, password, or both. Upon completion of the application, all applicants must go to Pay.gov to pay the application fee. Pay.gov will provide to CBP the tracking number and the amount paid. No credit card information will be collected or maintained by CBP.

Data Use

There are no new uses of data currently being collected for GES based on this update. The security question data will only be used to ascertain identity in the event a username and password are forgotten. If provided, the email address will be used to send username information and may be used to contact the individual to inform them to check GOES for status information; all other communication will be conducted through GOES.
Data Disclosure

There are no additional data disclosures from CBP.

Notice

Notice will be provided by this PIA update, of CBP’s use of an electronic enrollment system. Press releases will be issued to the public to announce the new process. A privacy statement that an applicant acknowledges is published on the website where the applicant information is collected.

Informed Consent

As described in previous PIA, the collected data is used only for the purposes of border and immigration management, national security, and law enforcement. Individuals have no opportunity to consent to or refuse the use of their data for any of these purposes. The trusted traveler programs are voluntary in nature. There is no change to this as a result of the implementation of the GOES component.

Redress

CBP has a Customer Satisfaction Unit in its Office of Field Operations to provide redress with respect to incorrect or inaccurate information collected or maintained by its electronic systems. If a traveler believes that CBP actions are the result of incorrect or inaccurate information, then inquiries should be directed to the Customer Satisfaction Unit at the following address: Customer Satisfaction Unit, Office of Field Operations, U.S. Customs and Border Protection, Room 5.5-C, 1300 Pennsylvania Avenue, NW, Washington, DC 20229, fax (202) 344-2791. Individuals making inquiries should provide as much identifying information as possible regarding them, to specify the record(s) at issue. The Customer Satisfaction Unit will respond in writing to each inquiry. Additionally, persons who have applied to become trusted travelers and persons who have been accepted into one or more trusted traveler program may contact the Customer Satisfaction Unit to obtain a copy of their submitted application data.

Security

GOES is maintained on CBP’s secured network. The CBP web site uses technology through the implementation of secure sockets layer (SSL0 communications between the CBP web server and the applicants web browser, to secure the transmission of the application data from the initial creation of a username and password to the finalization of the application. In the initial set up of the username and password, security questions are asked so that if the username and password are forgotten, the applicant can still gain access to the web site. In the event the username and password are forgotten, the applicant will be required to set up a new password for future use.
Conclusion

GOES will automate the data collection process for trusted traveler programs. It will provide a more convenient and efficient process for the public than is currently done through the paper application process. The GOES process will eliminate “re-keying” of the data from a handwritten or typed, paper application, and ensure that the records in the GES database are more accurate. CBP will also be able to process applications more efficiently as the administrative workload of manually entering applicant data into GES will be removed. The privacy risks of this new online collection have been mitigated through both security and documented procedures. Additionally, privacy is enhanced due to the fact that an individual processor who does not have the ability to approve the application is no longer required to see the personal information.

Responsible Official

Laurence E. Castelli, Chief  
Privacy Act Policy and Procedures Branch  
U.S. Customs and Border Protection

Approval Signature

________________________________  
Hugo Teufel III  
Chief Privacy Officer  
Department of Homeland Security