



Privacy Impact Assessment
for the

Travel and Employment Authorization Listings (TEAL)

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Contact Point

Donald Hawkins

Privacy Officer

United States Citizenship and Immigration Services

Department of Homeland Security

(202) 272-8404

Reviewing Official

Mary Ellen Callahan

Chief Privacy Officer

Department of Homeland Security

(703) 235-0780



Abstract

The Department of Homeland Security's (DHS) United States Citizenship and Immigration Services (USCIS) developed the Travel and Employment Authorization Listings (TEAL) system to streamline access to relevant information during the adjudication of certain benefits. TEAL consolidates immigration information about applicants from selected USCIS and DHS systems to provide greater accessibility to immigration information necessary to determine benefit eligibility. USCIS is conducting this Privacy Impact Assessment (PIA) because TEAL retrieves personally identifiable information (PII) from USCIS and DHS systems.

Overview

The USCIS Vermont Service Center (VSC) owns and operates TEAL. USCIS VSC is responsible for the timely and efficient adjudication of certain immigration benefits. In order to make the determination of whether to grant or deny an individual's application for an immigration benefit, USCIS adjudicators need to verify the accuracy of the information provided in the application and ascertain the applicant's eligibility for the benefit sought by querying other USCIS and DHS systems.

TEAL supports the VSC's ability to adjudicate the following immigration applications: I-90, Replacement National; I-130, Petition for Alien Relative; I-485, Application to Register Permanent Residence or Adjust Status; I-751, Petition to Remove the Conditions of Residence; and I-765, Application for Employment Authorization.

TEAL was developed to streamline access to relevant information by consolidating applicants' immigration information from selected USCIS and DHS systems. Through TEAL, users no longer need to access multiple systems individually. USCIS adjudicators use TEAL to query multiple systems in order to centralize an applicant's immigration information thereby reducing time to access each system. This facilitates VSC's ability to determine an applicant's benefit eligibility more efficiently.

TEAL retrieves data from the various systems using the applicant's Alien number (A-number). In order to retrieve an applicant's information, USCIS adjudicators must log-in using their supplied user credentials (e.g., user ID and password). The adjudicator then either enters the case receipt number or A-number into TEAL. The adjudicator may also use a barcode scanner to read the receipt number barcode that is affixed to the physical application. If the adjudicator inputs or scans the case receipt number, TEAL queries the Citizenship and Immigration Services Centralized Oracle Repository (CISCOR) to retrieve the applicant's A-number.¹ TEAL then uses the A-number to access relevant immigration information from various USCIS and DHS systems that have records associated with that A-number. TEAL may also be used in batch mode to query multiple A-numbers simultaneously. For batch mode queries, adjudicators enter multiple A-numbers or case receipt numbers into TEAL and then TEAL retrieves the necessary information for each case in sequence.

TEAL retrieves real-time, read-only immigration information from the following systems:

¹ See the USCIS Benefits Processing of Applicants other than Petitions for Naturalization, Refugee Status, and Asylum PIA and BIS SORN, DHS/USCIS -007 (73 FR 56596).



USCIS sources

- Central Index System (CIS)²
- Computer Linked Adjudication Information Management System 3.0 (CLAIMS 3) Mainframe (MF)³
- CISCOR⁴
- FD - 258 Federal Bureau of Investigation (FBI) Fingerprint Tracking System⁵
- FD - 258 FBI Name Check Response⁶
- Alien Change of Address Query Request (AR-11)⁷
- Refugees, Asylum and Parole System (RAPS)
- Marriage Fraud Mainframe System (MFAS)⁸

DHS Customs and Borders Protection's (CBP) sources

- Treasury Enforcement Communication System (TECS) Subject Lookout Search (SQ11)⁹
- TECS Arrival/Departure Data Query (SQ94)¹⁰

System access is determined by the benefit application under review. TEAL does not store any information from the source system in a separate database or in any other electronic format. The information is immediately discarded after each query.

Information retrieved by TEAL includes information provided by the individual on the application for immigration benefits, and varies depending on the benefit. This information includes, but is not limited to: full name, alias, date of birth, A-number, case receipt number, place of birth, and address history. The USCIS adjudicator prints screen shots from or record information retrieved by TEAL in the applicant's A-file, which is the hard copy or digitized file DHS keeps to store all information relevant to an immigrant's interactions with DHS as he or she applies for benefits and changes immigration status.¹¹ This information is used for USCIS benefits adjudication purposes to determine an applicant's eligibility for a benefit.

TEAL is an existing system and will eventually be replaced by the Person Centric Query Service (PCQS). There are no planned updates for this application.

² A-File/ CIS SORN, DHS/USCIS 001 (72 FR 1755).

³ Benefits Processing of Applicants other than Petitions for Naturalization, Refugee Status, and Asylum PIA and BIS SORN, DHS/USCIS -007 (73 FR 56596).

⁴ BIS SORN, DHS/USCIS -007 (73 FR 56596).

⁵ BCS SORN, DHS-USCIS-002 (72 FR 31082).

⁶ BCS SORN, DHS-USCIS-002 (72 FR 31082).

⁷ AR-11 PIA and BIS SORN, DHS/USCIS -007 (73 FR 56596).

⁸ BIS SORN, DHS/USCIS -007 (73 FR 56596).

⁹ CBP Border Crossing Information (BCI) SORN, DHS/CBP-007 (73 FR 43457)

¹⁰ CBP TECS SORN, DHS/CBP-011 (73 FR 77778).

¹¹ A-File/ CIS SORN, DHS/USCIS 001 (72 FR 1755).



The legal authority to operate TEAL is derived from 8 U.S.C. § 1101 *et seq.* More specifically, 8 U.S.C. § 1103 charges the Secretary of Department of Homeland Security (DHS) with the duty of administering and enforcing all laws relating to the immigration and naturalization of aliens. These laws are generally found in 8 C.F.R., *Aliens and Nationality*.

Section 1.0 Characterization of the Information

The following questions are intended to define the scope of the information requested and/or collected as well as reasons for its collection as part of the program, system, rule, or technology being developed.

1.1 What information is collected, used, disseminated, or maintained in the system?

TEAL retrieves the following information from USCIS and DHS systems to determine benefit eligibility: full name, alias, A-number, case receipt number, address, gender, date of birth, country of birth, country of citizenship, citizenship status, marital status, arrival and departure status, employment history, education record, background check search [statement of 'no hit' or 'positive hit'], fingerprint results [either 'IDENT,' meaning positive for possible criminal activity, or 'NONIDENT,' meaning no history of criminal activity], and FBI name check response [i.e., "Pending" because the search is ongoing, "No Record" or a "Positive Response"].

1.2 What are the sources of the information in the system?

TEAL retrieves information from the following IT systems:

USCIS sources

- CIS, which is used to maintain information on the status of individuals, including permanent residents, naturalized citizens, border crossers, apprehended aliens, legalized aliens, and aliens issued employment authorization. CIS also contains information regarding individuals who are under investigation (including those who are possible national security threats or threats to the public safety), or who were investigated by the DHS in the past, or who are suspected of violating immigration-related laws or regulations;
- CLAIMS 3 MF, which is used to process numerous USCIS applications;
- CISCOR, which is used to consolidate data from CLAIMS 3;
- FD - 258 FBI Fingerprint Tracking System, which is used to track the status of fingerprint submissions to and results from the FBI;
- FD - 258 FBI Name Check Response, which is used to maintain information relating to the subject's criminal history;



- AR-11, which is used to process change of address forms;
- RAPS, which is used to process Asylum applications; and
- MFAS, which is used for processing information relating to investigations of marriage fraud.

CBP sources

- TECS SQ11, which is used to maintain background information pertinent to the subject of the fraud investigation or background check ; and
- TECS SQ94, which is used to track the dates the subject enters and exits the U.S.

1.3 Why is the information being collected, used, disseminated, or maintained?

USCIS adjudicators use TEAL to verify applicant information and determine whether the applicant is eligible for the benefit being sought.

1.4 How is the information collected?

The information derived from the source system is collected from the applicant's immigration application, which is manually entered into the source system. TEAL retrieves real time, read-only information from the source systems. USCIS personnel print screen shots from TEAL and store the information in the applicant's hard copy A-file to support substantive decisions made about benefit eligibility. TEAL does not retain information retrieved from the source systems.

1.5 How will the information be checked for accuracy?

TEAL is dependent on the accuracy and quality of information from the source systems. TEAL ensures the accuracy data by retrieving real time, read-only information directly from the source systems.

1.6 What specific legal authorities, arrangements, and/or agreements defined the collection of information?

The legal authority to operate TEAL is derived from 8 U.S.C. § 1101 *et seq.* More specifically, 8 U.S.C. § 1103 charges the Secretary of Department of Homeland Security (DHS) with the duty of administering and enforcing all laws relating to the immigration and naturalization of aliens. These laws are generally found in 8 C.F.R., *Aliens and Nationality*.

1.7 Privacy Impact Analysis: Given the amount and type of data collected, discuss the privacy risks identified and how they were mitigated.

Privacy Risk: Unauthorized access to systems by authorized users.



Mitigation: System access is determined by the benefit application the adjudicator is processing. Not all systems are accessed for every application under review. Additionally, if a user attempts to gain access to information that he/she is not authorized; TEAL does not allow the return of information. The TEAL user's Supervisor determines the systems that are needed for each employee to perform his/her job via form G-872A.

Privacy Risk: More data given to the adjudicator than is necessary for a particular function.

Mitigation: Access to each source system is determined by the benefit application under review. USCIS implemented internal controls to ensure the minimum amount of information is used to determine benefit eligibility by the adjudicator. These controls include pre-defined screens for each application form or a specific scrape profile defined by the user. USCIS developed pre-defined screens for each application – I-90, I-130, I-485, I-751, and I-765. TEAL was developed to access specific systems and screens. The adjudicator also has the ability to modify the pre-defined screens to create their own custom profile. The adjudicator is limited to certain systems and screens when developing their custom scrape profiles.

Privacy Risk: Data inaccuracies.

Mitigation: TEAL is dependent on the accuracy and quality of information from the source systems. Because TEAL, just like all of USCIS, depends on data from several separate and very old IT systems, it is common for the adjudicator to encounter inaccurate data about the individual from at least one of the source systems. Until USCIS conducts a major overhaul of its systems and the data in those systems, USCIS relies heavily on trained adjudicators to ascertain which information is most accurate; this is part of the reason why TEAL brings together information from disparate systems.

The purpose of TEAL is to streamline access to immigration information from various systems to determine benefit eligibility. As part of the adjudication process, adjudicators compare the data from the source systems to the immigration application. TEAL ensures the accuracy of the data by retrieving real time, read-only information directly from the source system. Further, TEAL displays the source of information so that, given the data discrepancies between the source systems, the adjudicator can make an assessment of which data is the most up-to-date.

USCIS developed and implemented Standard Operating Procedures (SOPs) tailored for each application to assist adjudicators during the adjudication review process. These SOPs detail data quality standards and describe how to handle data inconsistencies while reviewing the application. As part of the SOPs, adjudicators are required to print screen shots from TEAL and store the copies in the applicant's A-file to support their benefit determination. Additionally, the source systems have SOPs in place to correct erroneous information.



Section 2.0 Uses of the Information

The following questions are intended to delineate clearly the use of information and the accuracy of the data being used.

2.1 Describe all the uses of information.

USCIS adjudicators use TEAL to begin the substantive analysis of the application under review. The immigration information retrieved from DHS and USCIS systems by TEAL is used to verify the accuracy of the information provided in the application and ascertain the applicant's eligibility for the benefit being sought.

2.2 What types of tools are used to analyze data and what type of data may be produced?

TEAL is not used to perform complex analytical tasks resulting in data matching such as relational analysis, scoring, reporting, or pattern analysis. The system does not create or make available new or previously unavailable data from newly derived information.

The system brings together information about an individual from disparate systems so that the adjudicator is able to see all information. TEAL clearly displays the source of all information returned. This way, the adjudicator is able to conduct his own analysis on which data is accurate and which data may not be relevant based on experience, training, and knowledge of the data sources.

2.3 If the system uses commercial or publicly available data please explain why and how it is used.

TEAL does not use commercial or publicly available data.

2.4 Privacy Impact Analysis: Describe any types of controls that may be in place to ensure that information is handled in accordance with the above described uses.

Privacy Risk: Misuse use of the information.

Mitigation: User access to TEAL is limited to USCIS employees who need the information to perform their job functions. The system administrator is responsible for granting the appropriate level of access. All USCIS employees are properly trained on the use of information in accordance with DHS policies, procedures, regulations, and guidance.

Privacy Risk: Data in raw form from source systems might be taken out of context and misinterpreted.



Mitigation: TEAL is dependent on the information provided by the source systems; therefore, it is vital for USCIS employees to understand why the PII was originally collected in those source systems to ensure that USCIS makes accurate benefit determinations. USCIS developed and established SOPs to ensure that TEAL users understand the context of the information provided by the data sources to result in the most accurate benefit determinations. Each SOP, which is tailored to each application form, details strict adjudicating guidelines to ensure the appropriate use of the information.

Privacy Risk: Unauthorized access.

Mitigation: All records are protected from unauthorized access through appropriate administrative, physical, and technical safeguards that include restricting access to authorized personnel who have a need-to-know. Access to TEAL is given only to a limited number of users for the purpose of determining benefit eligibility. Users must use their issued credentials to gain access to the system. USCIS also deploys user logs to ensure users are only accessing information related to their job functions.

Section 3.0 Retention

The following questions are intended to outline how long information will be retained after the initial collection.

3.1 How long is information retained?

TEAL does not store any information retrieved from the source system in a separate database or in any other electronic format. The information is available only during the duration of the viewing session. USCIS adjudicators may print screen shots from TEAL to support benefit decisions. The hard copy print-outs are stored in the applicant's A-file, which are permanently retained in A-File records. The information retrieved by TEAL is immediately discarded after each query.

3.2 Has the retention schedule been approved by the component records officer and the National Archives and Records Administration (NARA)?

TEAL does not collect, maintain, or store data from the source system. Therefore, a retention schedule is not applicable.

When USCIS personnel print out screen shots from TEAL, those hard copies become part of the recipient's A-File, which NARA has approved as being a permanent record. USCIS keeps these paper records until 100 years from the subject's date of birth, and then transfers them to NARA for permanent storage.



3.3 Privacy Impact Analysis: Please discuss the risks associated with the length of time data is retained and how those risks are mitigated.

TEAL mitigates the risks associated with retaining data by refraining from retaining source system information in a separate database or in any other electronic format. The information is immediately discarded after each query. The exception to this is screen shots of data sets used to make a determination, which are printed out and retained for the specific purpose of preserving data used to make a decision.

Section 4.0 Internal Sharing and Disclosure

The following questions are intended to define the scope of sharing within the Department of Homeland Security.

4.1 With which internal organization(s) is the information shared, what information is shared and for what purpose?

TEAL does not share information with any internal organizations. The information retrieved by TEAL from USCIS and DHS systems is only available to USCIS adjudicators for the purpose of determining benefit eligibility. However, information that is printed out and put into the A-File is subject to the A-File sharing procedures, which are explained in the DHS/USCIS A-File system of records notice (72 FR 1755). Generally, the A-File may be accessed by Immigration and Customs Enforcement (ICE), and Customs and Border Protection (CBP), and Intelligence and Analysis (I&A) when their staffs have a need to know the information in those files as part of their official duties.

4.2 How is the information transmitted or disclosed?

USCIS does not transmit or disclose information to other internal sources through TEAL.

4.3 Privacy Impact Analysis: Considering the extent of internal information sharing, discuss the privacy risks associated with the sharing and how they were mitigated.

Privacy Risk: Unauthorized access to TEAL

Mitigation: User access to TEAL is limited to those who need the information to perform their job functions. Access to TEAL is not available to any other DHS components. In addition, an audit log is maintained to track all system transactions. The audit log, which includes the date, time, and user for each transaction, is secured from unauthorized modification, access, or destruction.



Section 5.0 External Sharing and Disclosure

The following questions are intended to define the content, scope, and authority for information sharing external to DHS which includes Federal, state and local government, and the private sector.

5.1 With which external organization(s) is the information shared, what information is shared, and for what purpose?

TEAL does not share information with external organizations.

5.2 Is the sharing of personally identifiable information outside the Department compatible with the original collection? If so, is it covered by an appropriate routine use in a SORN? If so, please describe. If not, please describe under what legal mechanism the program or system is allowed to share the personally identifiable information outside of DHS.

TEAL does not share information with external organizations.

5.3 How is the information shared outside the Department and what security measures safeguard its transmission?

TEAL does not share information with external organizations.

5.4 Privacy Impact Analysis: Given the external sharing, explain the privacy risks identified and describe how they were mitigated.

Not applicable. TEAL does not share information with external organizations.

Section 6.0 Notice

The following questions are directed at notice to the individual of the scope of information collected, the right to consent to uses of said information, and the right to decline to provide information.

6.1 Was notice provided to the individual prior to collection of information?

Individuals submit their information directly to USCIS at the time of information collection in the form of applications or petitions. While USCIS does not notify individuals at every point that the



information is transferred within USCIS as the applications and petitions are processed, individuals are considered to be notified by virtue of the fact that they applied for a benefit.

Additionally, TEAL is covered by the Alien File (A-File) and Central Index System (CIS) System of Records Notice (SORN) (66 FR 46813 DHS/USCIS-001).¹² Benefits Information System (BIS) SORN (73 FR 56596 DHS/USCIS-007),¹³ and Background Check System (BCS) SORN (72 FR 31082 DHS/USCIS-002).¹⁴ The A-File/CIS, BIS, and, BCS SORNs provide notice to individuals regarding the collection, use, and dissemination of information. In addition, each form or application on which USCIS collects information contains the required Privacy Act Statement regarding use and dissemination of the information. This PIA serves similar notice.

6.2 Do individuals have the opportunity and/or right to decline to provide information?

Providing information on immigration forms is a voluntary act on the part of the individual seeking a benefit. The individual, however, must submit a complete application in order to receive USCIS benefits. Applicants may decline to provide the required information; however, it may result in the denial of the applicant's benefit. This condition is clearly stated on each USCIS form.

6.3 Do individuals have the right to consent to particular uses of the information? If so, how does the individual exercise the right?

An applicant provides consent by virtue of applying for a USCIS benefit.

6.4 Privacy Impact Analysis: Describe how notice is provided to individuals, and how the risks associated with individuals being unaware of the collection are mitigated.

Privacy Risk: Individuals are unaware of the purposes for which their information is used.

Mitigation: Applicants applying for USCIS benefits are made aware that the information they are providing is being collected to determine whether they are eligible for their respective benefit. The USCIS application contains a provision by which an applicant authorizes USCIS to release any information from the application as needed to determine eligibility for benefits.

¹² Available at <http://edocket.access.gpo.gov/2007/E7-375.htm>.

¹³ Available at <http://edocket.access.gpo.gov/2008/E8-22802.htm>.

¹⁴ Available at <http://edocket.access.gpo.gov/2007/07-2782.htm>.



Section 7.0 Access, Redress and Correction

The following questions are directed at an individual's ability to ensure the accuracy of the information collected about them.

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

TEAL does not retain information derived from the source systems. USCIS adjudicators store screen shot print-outs from TEAL in the applicant's A-file. Individuals may seek access to information in TEAL via its source systems, covered by the BIS SORN or the A-File SORN, unless the information is covered by an appropriate exemption from one or more of the Privacy Act requirements, but are unable to access TEAL directly because it does not separately maintain the source system's information. Individuals should direct his or her request to the USCIS FOIA / Privacy Act (PA) Officer at USCIS FOIA/PA, 70 Kimball Avenue, South Burlington, Vermont 05403-6813 (Human resources and procurement records) or USCIS National Records Center (NRC), P. O. Box 648010, Lee's Summit, MO 64064-8010 (all other USCIS records). The process for requesting records can be found at 6 Code of Federal Regulations, Section 5.21.

7.2 What are the procedures for correcting inaccurate or erroneous information?

The source systems are fully responsible for the data retrieved by TEAL. The source systems maintain procedures that allow individuals to gain access to their information through redress procedures as described in their applicable SORNs. Requests to contest or amend information contained in source systems should be submitted as discussed in Section 7.1. The requestor should clearly and concisely state the information being contested, the reason for contesting or amending it, and the proposed amendment. The requestor should also clearly mark the envelope, "Privacy Act Amendment Request." The record must be identified in the same manner as described for making a request for access.

7.3 How are individuals notified of the procedures for correcting their information?

Individuals are notified of the procedures for correcting their information on the USCIS application. Additionally, the Privacy Act SORN and PIA for the source systems provide individuals with guidance regarding the procedures for correcting erroneous information.

7.4 If no formal redress is provided, what alternatives are available to the individual?

Normal redress procedures are provided to applicants as outlined in Sections 7.1 and 7.2.



7.5 Privacy Impact Analysis: Please discuss the privacy risks associated with the redress available to individuals and how those risks are mitigated.

Privacy Risk: Individuals may not be able to access or correct their information.

Mitigation: Individuals are given numerous opportunities during and after the completion of the applications process to correct information they have provided. USCIS allows individuals to request access to amend their information by submitting a Privacy Act request unless the information is covered by an appropriate exemption from one or more of the Privacy Act requirements. USCIS reviews individual requests to determine whether or not information may be released if the information is covered by a Privacy Act exemption.

Section 8.0 Technical Access and Security

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

8.1 What procedures are in place to determine which users may access the system and are they documented?

Access to TEAL is limited to authorized USCIS employees. TEAL offers two levels of access: System Administrator and User. The TEAL user's supervisor determines the systems that are needed for each employee to perform his/her job via form G-872A. This form is sent to the local Password Issuance and Control (PICS) officer and system access is then granted to the employee.

8.2 Will Department contractors have access to the system?

USCIS contractors do not have access to TEAL.

8.3 Describe what privacy training is provided to users either generally or specifically relevant to the program or system?

USCIS provides privacy and security awareness training to all personnel annually. The privacy training addresses appropriate privacy concerns, including Privacy Act obligations (e.g., SORNs, Privacy Act Statements, etc.). The security awareness training examines appropriate technical, physical, personnel, and administrative control measures. Each USCIS site has the responsibility to ensure that all federal employees and contractors receive the required annual computer security awareness training and Privacy Act training.



8.4 Has Certification & Accreditation been completed for the system or systems supporting the program?

TEAL is covered under the VSC Certification and Accreditation. The Authority to Operate (ATO) for Vermont Service Center, which includes TEAL, was issued on June 2, 2008 and is valid for a 3 year period (expires June 2, 2011).

8.5 What auditing measures and technical safeguards are in place to prevent misuse of data?

In accordance with DHS security guidelines, TEAL uses auditing capabilities that log user activity. All user actions are tracked via audit logs to identify audit information by user identification, network terminal identification, date, time, and data accessed. Access to the TEAL audit logs is limited to the TEAL administrator. Furthermore, each employee is given annual privacy and security awareness training that addresses their duties and responsibilities to protect the data.

8.6 Privacy Impact Analysis: Given the sensitivity and scope of the information collected, as well as any information sharing conducted on the system, what privacy risks were identified and how do the security controls mitigate them?

Privacy Risk: Unauthorized access

Mitigation: Access and security controls have been established to mitigate privacy risks associated with authorized and unauthorized users, namely misuse and inappropriate dissemination of data. Authorized users are broken into specific classes with specific access rights. Audit trails are kept in order to track and identify unauthorized uses of system information. Data encryption is employed at every appropriate step to ensure that only those authorized to view the data may do so and that the data has not been, compromised while in transit. Further, TEAL complies with the DHS security guidelines which provide hardening criteria for securing networks, computers and computer services against attack and unauthorized information dissemination. Data encryption between TEAL and the source system is accomplished using packet encryption on Cisco routers. Encryption parameters are controlled by Network Operation Center (NOC) and Security Operation Center (SOC) and meet Federal Information Security Management Act (FISMA) requirements.

Section 9.0 Technology

The following questions are directed at critically analyzing the selection process for any technologies utilized by the system, including system hardware, RFID, biometrics and other technology.

9.1 What type of project is the program or system?

TEAL is an emulator application. An emulator application allows an adjudicator workstation to



connect to and copy read-only information from the source system.

9.2 What stage of development is the system in and what project development lifecycle was used?

TEAL is in the operations phase of the system development life cycle.

9.3 Does the project employ technology which may raise privacy concerns? If so please discuss their implementation.

TEAL does not employ technologies that may raise privacy concerns. TEAL searches and retrieves information necessary to adjudicate certain benefits and does not have any ability to track, or in any way monitor, the activities of individuals outside of the information required to process the benefit application.

Responsible Officials

Donald Hawkins,
USCIS Privacy Officer
Department of Homeland Security

Approval Signature

Original signed and on file with the DHS Privacy Office.

Mary Ellen Callahan
Chief Privacy Officer
Department of Homeland Security