



**Privacy Impact Assessment Update  
for the  
USCIS Person Centric Query Service  
Supporting Immigration Status Verifiers of the  
USCIS Enterprise Service  
Directorate/Verification Division**

**DHS/USCIS/PIA-010(e)**

**June 8, 2011**

**Contact Point**

**Janice Jackson**

**Privacy Branch, Verification Division  
United States Citizenship and Immigration Services  
202-443-0109**

**Reviewing Official**

**Mary Ellen Callahan**

**Chief Privacy Officer**

**Department of Homeland Security**

**(703) 235-0780**



## Abstract

This is an update to the existing Privacy Impact Assessment (PIA) for the United States Citizenship and Immigration Services (USCIS) Person Centric Query Service (PCQS). This update describes the privacy impact of expanding the status verifier's person-search capability by adding the American Association of Motor Vehicle Administrators Network Service (AAMVAnet) system to the existing PCQS query inventory.

## Introduction

The Person Centric Query Service (PCQS) is an information technology (IT) service that provides United States Citizenship and Immigration Services (USCIS) status verifiers with the ability to submit a single query for all transactions involving an immigrant across a number of connected systems.<sup>1</sup> PCQS returns a consolidated response of the immigrant's past interactions with the federal government as he/she passed through the U.S. immigration system, listing the name of the underlying system and the relevant information reported from that system.<sup>2</sup> PCQS removes the complexity of accessing individual systems separately by presenting a single access point for the status verifier.<sup>3</sup> USCIS provides PCQS through the USCIS Enterprise Service Bus (ESB).<sup>4</sup>

PCQS does not store data. PCQS serves as a conduit for the delivery of data stored in the connected systems. When the status verifier submits a query via PCQS, data from the connected systems is aggregated, encrypted, and returned to the status verifier. When the PCQS query is complete, the data is automatically erased from the status verifier's computer memory.

Status verifiers within the USCIS Verification Division use PCQS to retrieve data related to an individual's immigration status and/or confirm document validity in the event that an automatic record match is not found during an initial query. Status verifiers use PCQS to determine employment eligibility using the Verification Information System (VIS), or benefit eligibility using the Systematic Alien Verification for Entitlements (SAVE) Program. Status verifiers may conduct queries based on an individual's name and date of birth, alien number, document number, receipt number, or I-94 (Arrival-Departure record) number. Status verifiers must select the specific connected systems they would like the PCQS to query. The PCQS response returns a limited amount of data as described in previous PCQS PIAs, such as name, date of birth, etc.<sup>5</sup> If the data returned to PCQS by the connected systems is not sufficient, status verifiers can access certain additional data on the individual contained in each connected

---

1 A "connected system" is a system, data set, system, or database that PCQS accesses to either retrieve or deliver data. See section titled "Connected Systems" for complete list of systems connected to the PCQS.

2 For more details on PCQS, see [www.dhs.gov/privacy](http://www.dhs.gov/privacy) for the PIA for PCQ Service published on June 22, 2007.

3 For more details on status verifiers, see [www.dhs.gov/privacy](http://www.dhs.gov/privacy) for the PIA for E-Verify Program published on May 4, 2010.

4 See [www.dhs.gov/privacy](http://www.dhs.gov/privacy) for the PIA for Enterprise Service Bus published on June 22, 2007.

5 See [www.dhs.gov/privacy](http://www.dhs.gov/privacy) for the PIA for PCQ Service published on June 22, 2007.



system, with the exception of the American Association of Motor Vehicle Administrators Network Service (AAMVAnet). Since AAMVAnet is a conduit like PCQS, there is no individual system to log into for further data. Rather, status verifiers would manually contact the specific Motor Vehicle Agency (MVA) that owns the data on the individual being queried. This process is discussed in the AAMVAnet section of this PIA. For more information, see the PIA for Records and Information from Department of Motor Vehicles for E-Verify (RIDE).

If PCQS returns data that is not sufficient for status verifiers to make a decision, direct access to an individual connected system could assist status verifiers with a more robust picture of the individual being queried and thus assist status verifiers in making a more informed decision. It is projected that by early 2012, status verifiers will be able to access US-VISIT's Arrival and Departure Information System (ADIS) through PCQS.<sup>6</sup> USCIS will update this PIA at that time.

The connected system addressed in this Privacy Impact Assessment (PIA) Update for PCQS was analyzed for potential privacy impacts and complies with privacy compliance documentation requirements. The existing PIA and System of Records Notices (SORNs) related to the connected system provide for the use of Personally Identifiable Information (PII) that is described in this PIA Update.

The owner of the connected system sharing PII via PCQS formally agreed to share the PII, and the status verifiers formally agreed to limit the use of PII, in the manner described in this PIA Update. The remainder of this PIA Update lists the current systems connected to PCQS and explains the addition of AAMVAnet.

## Reason for the PIA Update

USCIS has added one new system to meet the original collection purposes and needs of the Verification Division to confirm document validity in the event that an automatic record match is not found during an initial query. While some of the systems may provide some duplicate data from other systems to which the status verifier currently has access, the addition of this system is justified based on the need to ensure that the data is current and accurate. This PIA update covers the addition of AAMVAnet to PCQS and addresses the privacy impact and associated risks with adding this system.

## Connected Systems

As noted in the August 13, 2008 PIA<sup>7</sup>, PCQS provides access to the following systems:

1. Central Index System (CIS);

---

<sup>6</sup> See [http://www.dhs.gov/xlibrary/assets/privacy/privacy\\_pia\\_usvisit\\_adis\\_2007.pdf](http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_usvisit_adis_2007.pdf) for the PIA titled Arrival and Departure Information System.

<sup>7</sup> See [www.dhs.gov/privacy](http://www.dhs.gov/privacy) for the PIA titled: USCIS Person Centric Query Service Supporting Immigration Status Verifiers of the USCIS National Security and Records Verification Directorate/Verification Division Update, published August 13, 2008.



2. Citizenship and Immigration Services Centralized Operational Repository (CISCOR);
3. Computer-Linked Application Immigration Management System 3.0 (CLAIMS 3);
4. Computer-Linked Application Immigration Management System 4.0 (CLAIMS 4);
5. Customer Profile Management System (CPMS)<sup>8</sup>;
6. Department of State (DOS) Consular Consolidated Database (DOS-CCD);
7. ENFORCE Integrated Database (EID);
8. Executive Office Immigration Review System (EOIR);
9. Student and Exchange Visitor Information System (SEVIS);
10. Microfilm Digitization Application System (MiDAS);
11. National File Tracking System (NFTS);
12. Reengineered Naturalization Applications Casework Systems (RNACS);
13. Refugees, Asylum, and Parole System (RAPS);
14. TECS Arrival/Departure Data Query (TECS SQ94); and
15. TECS Subject Lookout Search (SQ11).

This PIA update adds one new system to the PCQS access capability:

1. American Association of Motor Vehicle Administrators Network Service (AAMVAnet).

This new system is described below.

## **American Association of Motor Vehicle Administrators Network Service**

AAMVAnet is a conduit that provides access to biographical data collected from individuals who have applied for and received a driver's license, driver's permit, or identification (ID) card through a state MVA. Status verifiers will use the data from AAMVAnet to confirm the identity of individuals presenting a driver's license, driver's permit, or state-issued ID card during the E-Verify process or to resolve any data mismatches.

Status verifiers will only have access to the following data from AAMVAnet for documents that originate in a state that has entered into a Memorandum of Agreement (MOA) with DHS USCIS for verification of this information.

---

<sup>8</sup> Formerly known as Biometric Storage System (BSS), CPMS is the new repository of all biometric data in USCIS. It stores biographic and biometric card data for I-131 Travel documents, I-765 Employment Authorization Documents (EAD) and Permanent Residency Cards (PRC); it also stores ten-print biographic and biometric data.



- Name (Last, First, Middle)
- Date of Birth
- Document Type
- Document Number
- Document Expiration Date
- Jurisdiction/State of Issuance

Status verifiers will be restricted from accessing any information through AAMVAnet unless the verification is related to a driver's license, driver's permit, or state-issued ID card. Status verifiers will have to select in PCQS the type of document presented for verification. If the document selected is a driver's license, driver's permit, or state-issued ID card, AAMVAnet will become available for status verifiers to query if the state that issued the document has signed an MOA with DHS USCIS.

Internal audits of E-Verify transactions on multiple occasions show new hires who work in the United States most often present a driver's license and Social Security card as their documentation proof for the Form I-9, Employment Eligibility Verification. Therefore, the addition of the AAMVAnet interface to PCQS significantly increases the effectiveness of E-Verify by improving identity verification during the work authorization process. Furthermore, AAMVAnet improves E-Verify customer service by increasing the accuracy of E-Verify queries, giving customers increased confidence in identity assurance.

The American Association of Motor Vehicle Administrators operates AAMVAnet. The data DHS is reviewing is done so under a MOA with the particular state MVA. USCIS is adding this system to enhance E-Verify through the RIDE initiative.

RIDE seeks to increase the effectiveness of E-Verify by automating motor vehicle document (e.g., driver's license, driver's permit, state-issued ID card) verification between state MVAs and E-Verify employers. RIDE enhances E-Verify by providing the ability to validate the information entered by an employer against MVA data. AAMVAnet allows E-Verify to securely connect to MVA databases electronically for the purposes of RIDE. Furthermore, the issuing state or jurisdiction of the driver's license, driver's permit, or state-issued ID card must have a MOA with DHS USCIS to allow verification for the purpose of RIDE.<sup>9</sup>

## Privacy Impact Analysis

---

<sup>9</sup> See [www.dhs.gov/privacy](http://www.dhs.gov/privacy) for the PIA for American Association of Motor Vehicle Administrators (AAMVA) Records and Information from DMVs for E-Verify (RIDE), published concurrently, and available on the DHS Privacy Office website. The SORN for this connected system is entitled DHS/USCIS-011 E-Verify Program System of Records May 9, 2011, 76 FR 26738.



### **The System and the Information Collected and Stored within the System**

PCQS performs queries to the connected systems, aggregates the results, and sends the data to the status verifier. The results are read-only and PCQS neither collects nor stores the data. Data gathered by PCQS from connected systems is used for the purposes of servicing a query by the status verifier and returning a consolidated/correlated set of data to the status verifier.

With the addition of AAMVAnet data, DHS has increased the amount and type of PII it can review on an individual. In doing so, DHS considered the risks and benefits of accessing such PII (see E-Verify RIDE PIA DHS/USCIS/PIA-030(b)) and determined that the process would be more efficient without reciprocal privacy risks by using PCQS.

### **Uses of the System and the Information**

The AAMVAnet connection to PCQS allows a status verifier to perform a query based on the individual's date of birth, state-issued document type, and document number in order to check the authenticity of the identity document presented during the E-Verify process. PCQS allows a status verifier to access data only from states that have a MOA with DHS USCIS to participate in E-Verify RIDE.

There is no change in the use of data as outlined by the PCQS PIA (DHS/USCIS/PIA-010), and the E-Verify PIA Update for RIDE (DHS/USCIS/PIA-030(b)).<sup>10</sup> The value of PCQS is its ability to provide a single service to query and retrieve data from the connected systems. Status verifiers use the consolidated response from PCQS to help make benefit determinations and determine the current immigration status of an individual. When status verifiers detect discrepancies, such as immigration fraud or processing errors, PCQS provides status verifiers with data to analyze the discrepancy.

This new release of PCQS provides controlled access to one additional system. Increasing access to the additional system may add additional risks of unauthorized access. However, PCQS mitigates this risk by limiting access to only those data elements relevant to the query, thus lowering the level of privacy risk. PCQS access and security controls are established to mitigate privacy risks associated with misuse and inappropriate dissemination of data. Authorized users are broken into specific user roles with specific access rights. The Office of Information Technology (OIT) runs and maintains audit trails in order to identify, mitigate, and track unauthorized uses of system information. Data encryption is employed to ensure that only those authorized to view the data may do so and that the data is not compromised while in transmission. PCQS complies with DHS security guidelines, which provide hardening criteria for securing networks, computers, and computer services against attack and unauthorized information dissemination. The USCIS Verification Division also provides extensive operational and privacy training and awareness for the use of PCQS.

---

<sup>10</sup> See [http://www.dhs.gov/xlibrary/assets/privacy/privacy\\_pia\\_uscis\\_pcq.pdf](http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_uscis_pcq.pdf) for PCQS PIA. See [www.dhs.gov/privacy](http://www.dhs.gov/privacy) for E-Verify PIA Update for RIDE.



Another risk is that individuals may be unaware that their PII could be subject to a secondary use, to include verification. This risk is mitigated by providing notice to the public with this PIA update, which describes the use of PII retrieved from AAMVAnet. In addition, the owner of each of the connected systems is responsible for updating privacy documentation to reflect new users or new purposes for which PII is collected.

### **Retention**

PCQS does not collect or store data. Therefore, a data retention schedule is not applicable. When status verifiers make a decision based on PCQS, the decision (e.g., employment authorized or final non-confirmation) is recorded in the VIS case management tracker, which is then relayed to the employer via E-Verify.

### **Internal Sharing and Disclosure**

DHS internal sharing and disclosure of data in PCQS remains unchanged and is described in previous PCQS PIAs. The internal users of this data are individuals within USCIS and other DHS components who have a DHS security clearance and whose job responsibilities require access to PCQS.

### **External Sharing and Disclosure**

PCQS does not store data. PCQS serves as a conduit for the delivery of data stored in the connected systems. When the status verifier submits a query via PCQS, the data from the connected systems is aggregated, encrypted, and returned to the status verifier. When the PCQS query session ends, the data is automatically erased from the status verifier's computer memory.

The status verifier must adhere to the PCQS system Rules of Behavior, which explicitly state, among other constraints, that the data may not be forwarded or shared with any other user, and that the data may not be stored on any device.

Prior to any PCQS user being granted access to this service, the business system owners of the connected systems must first obtain a signed Interconnectivity Security Agreement with the PCQS OIT Program Manager. This agreement outlines the appropriate uses of the information in conformance with privacy and security requirements.



### Notice

This PIA update (DHS/USCIS/PIA-010(e)) will not impact any notice requirements. The data retrieved from the connected IT systems by PCQS is covered by the following system of records:

- DHS/USCIS-001: Alien File (A-File) and Central Index System (CIS) dated January 16, 2007, 72 FR 1755.
- DHS/USCIS-003: Biometric Storage System dated April 6, 2007, 72 FR 17172.
- DHS/USCIS-007: Benefits Information System dated September 29, 2008, 73 FR 56596.
- DHS/USCIS-011: E-Verify Program System of Records dated May 9, 2011, 76 FR 26738.

### Individual Access, Redress, and Correction

This update will not impact any access, redress, or correction requirements. PCQS provides a mechanism to view data that is collected and resides across multiple connected systems. If PCQS distributes erroneous data, it is the responsibility of the connected system owner to have the data corrected in accordance with the standard operating procedures of the particular system. Individuals may seek more information on access, redress, or correction by accessing the PIA for the individual system on the DHS Privacy web page.<sup>11</sup>

### Technical Access and Security

Technical access and security of PCQS remain unchanged by this PIA update and no further technical access and security risks have been identified.

### Technology

This update does not affect the technology currently used for PCQS and no further technology risks have been identified.

---

<sup>11</sup> The DHS Privacy website address: [www.dhs.gov/privacy](http://www.dhs.gov/privacy).



## **Responsible Official**

Janice M. Jackson  
Acting Chief, Privacy Branch  
U.S. Citizenship and Immigration Services  
Verification Division  
Department of Homeland Security

## **Approval Signature**

Original signed copy on file with the DHS Privacy Office

Mary Ellen Callahan  
Chief Privacy Officer  
Department of Homeland Security