

**In the
Supreme Court of the United States**

UNITED STATES DEPARTMENT OF HOMELAND SECURITY, *et al.*,

Applicants,

v.

LEAGUE OF WOMEN VOTERS, *et al.*,

Respondents.

**ON APPLICATION FOR A STAY OF THE ORDER ISSUED BY THE
UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA**

OPPOSITION TO APPLICATION FOR A STAY

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CORPORATE DISCLOSURE STATEMENT

In accordance with United States Supreme Court Rule 29.6, Respondents League of Women Voters, League of Women Voters of Virginia, League of Women Voters of Louisiana, League of Women Voters of Louisiana Education Fund, League of Women Voters of Texas, and Electronic Privacy Information Center are non-profit corporations with no parent entity, and no entity has a greater than 10 percent ownership interest in them.

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INTRODUCTION

Congress has not authorized the federal government to create a master database of U.S. citizens. Nor does the government possess any dataset capable of providing accurate, real-time verification of individuals' U.S. citizenship status. And multiple statutes restrict federal agencies' ability to use, repurpose, and disclose Americans' sensitive personal information—either within the federal government or outside of it. These laws protect Americans from government overreach into their private lives and the careless use of their sensitive information held in trust by the federal government.

Disregarding these laws, the government has recklessly created an error-laden master citizenship database that endangers millions of Americans' privacy and voting rights. In 2025, the Department of Homeland Security ("DHS") and Social Security Administration ("SSA") rapidly transformed a 40-year-old immigration database—the Systematic Alien Verification for Entitlements system, or "SAVE"—into a new tool for mass "voter verification" and benefits eligibility checks. The modified system ("Modified SAVE") performs bulk searches of SSA data to check individuals' U.S. citizenship status, even though the government admits this data is not a reliable indicator of current citizenship status. The government created the system despite internally acknowledging it violated federal privacy laws and risked misidentifying eligible voters as non-citizens. And the flawed system has resulted in error rates as high as 81% in some localities. Among the American citizens caught in the fallout are Respondents' members, whose privacy and voting rights were violated and remain imperiled by Modified SAVE.

The court of appeals correctly refused to stay the district court's summary judgment order vacating the government's 2025 SAVE modifications pending appeal, and this Court should do the same. The government cannot meet its heavy burden to obtain this "extraordinary" relief. App.104a.

The government is not likely to succeed on the merits. Respondents have standing because Modified SAVE inflicts cognizable injuries on their members' voting, privacy, and reputational interests. The government forfeited key arguments below. And the SAVE modifications exceeded Applicants' statutory authority and violated the Social Security Act, Privacy Act, and Administrative Procedure Act.

Applicants' merits arguments hinge on a flawed, newly advanced reading of a 30-year-old statute, 8 U.S.C. § 1373. That reading misconstrues prohibitory text in § 1373(a) and § 1373(b) ("may not prohibit, or in any way restrict") as an affirmative grant of authority to consolidate and disclose millions of Americans' protected information. And it misconstrues DHS's duty to "respond" to a citizenship inquiry under § 1373(c) as impliedly "overrid[ing]" all preexisting statutory restrictions on disclosure, including the Social Security Act and Privacy Act. App.22-23.

The government's boundless reading of § 1373 defies normal rules of statutory construction and the Executive's own longstanding interpretation of the statute. Accepting it would give DHS unlimited power to vacuum up millions of Americans' sensitive information from SSA (or any other agency) and disclose it in bulk to states however it wants. Surely if Congress meant to confer that extraordinary power, it would have done so clearly and expressly. It did not. Meanwhile, several bills that *would* expressly authorize the SAVE modifications have failed in Congress. Modified SAVE thus has "conveniently" enabled DHS and SSA to "enact a program' that Congress has chosen not to enact itself." *Biden v. Nebraska*, 600 U.S. 477, 503 (2023).

Neither the government nor the public will be harmed by continuing to limit SAVE to its pre-2025 functionality pending appeal, the status quo since June 22. Agencies remain free to use SAVE for individualized citizenship checks as they did for decades prior to 2025. And states remain free to use their own robust voter registration and list-maintenance processes to ensure the integrity of their voter rolls.

The government also lacks a substantial interest in operating a citizenship

database it admits is error-prone and unreliable. Though the government touts SAVE’s “millions” of “verification[s],” App.4, it omits the number of eligible voters whose citizenship SAVE has inaccurately called into question, and who consequently have been erroneously purged from voter rolls or forced to reverify their citizenship, which includes Respondents’ members. “[N]othing in this preliminary stay posture necessarily calls for allocating the risk of error to citizens eligible to vote who may be burdened by inaccurate modified-SAVE results rather than to states temporarily unable to use modified SAVE’s new functionality.” App.118a.

This case is an especially poor candidate for emergency relief for three additional reasons. First, the government seeks review not of an order granting preliminary relief, but of a summary judgment decision following cross-dispositive motions based on a voluminous administrative record. The Court should not grant “emergency relief in a fact-intensive and highly technical case without fully engaging with both the relevant law and the voluminous record.” *Ohio v. EPA*, 603 U.S. 279, 300 (2024) (Barrett, J., dissenting). Second, this case involves arguments that all judges below (including the dissenting judge) found that the government forfeited. *See* App.104a, 142a. This Court “‘normally declines to entertain’ arguments ‘forfeited’ by the parties,” *Ohio*, 603 U.S. at 298-99, and doing so at the emergency stay stage would be “highly unusual” since it would require the Court “to doubly exercise discretion in [the government’s] favor,” App.120a, 114a. Finally, the court of appeals expedited the appeal in denying a stay, App.103a, and noted a “subsequent merits panel remains free to decide” whether to excuse the government’s forfeiture, App.120a, further undercutting the need for this Court’s immediate intervention.

The application for a stay should be denied.¹

¹ “App.” refers to the stay application. “Dkt.” refers to district court docket entries. The administrative record was docketed in the district court at Dkt.110, and cited excerpts (e.g., DHS-AR-XXX) are included in the attached supplemental appendix.

STATEMENT

I. Statutory Background

A. The Social Security Act of 1935

The Social Security Act of 1935 created financial assistance benefit programs for millions of Americans. Pub. L. No. 74-271, 49 Stat. 620 (codified at 42 U.S.C. § 301 *et seq.*). Privacy was central to Social Security from the start. The Social Security Board's first regulation prohibited any "member, officer, or employee of the Board" from disclosing "any record . . . or any information acquired therefrom . . . pertaining to any person." Disclosure of Official Records & Information, 2 Fed. Reg. 1256, 1256 (June 18, 1937). In 1939, Congress codified that prohibition in the Social Security Act. *See* Social Security Act Amendments of 1939, Pub. L. No. 76-379, title VIII, § 1106, 53 Stat. 1360, 1398. Today, the Act prohibits SSA's "disclosure . . . of any file, record, report, or other paper, or any information . . . except as . . . agency . . . regulations prescribe and except as otherwise provided by Federal law." 42 U.S.C. § 1306(a).

Another provision prohibits any "officer or employee of the United States" from disclosing the "[s]ocial security account numbers and related records that are obtained or maintained . . . pursuant to any provision of law enacted on or after October 1, 1990." 42 U.S.C. §§ 405(c)(2)(C)(viii)(I), (III). A "related record" is "any record, list, or compilation that indicates, directly or indirectly, the identity of any individual with respect to whom a social security account number or a request for a social security account number is maintained." *Id.* § 405(c)(2)(C)(viii)(IV).

SSA's policy manual recognizes that SSA does "not have the legal authority to disclose information about U.S. citizens to DHS," and that "[i]f DHS requests information and [SSA] determine[s] the information pertains to both U.S. citizens and aliens, only information about the aliens can be disclosed." SSA Program Operation Manual System ("POMS"), GN 03325.002 *Disclosure and Verification of Social Security Numbers (SSN) Without Consent* (2023), <https://perma.cc/PE44-2QBK>

(“SSA Disclosure Policy”); accord SSA POMS, GN 03313.095 *Disclosure to the Department of Homeland Security (DHS)* (2025), <https://perma.cc/NZR7-MVB7>.

B. The Privacy Act of 1974

The Privacy Act of 1974 established “safeguards for an individual against an invasion of personal privacy.” Pub. L. No. 93-579, § 2(b)(4), 88 Stat. 1896, 1896 (codified at 5 U.S.C. § 552a note). The Act “was passed largely out of concern over ‘the impact of computer data banks on individual privacy.’” *DOJ v. Reps. Comm. for Freedom of the Press*, 489 U.S. 749, 766 (1989) (quoting H.R. Rep. No. 93–1416, at 7 (1974)); see also *Londrigan v. FBI*, 670 F.2d 1164, 1169 (D.C. Cir. 1981) (statute was enacted amid “growing awareness that governmental agencies were accumulating an ever-expanding stockpile of information about private individuals that was readily susceptible to both misuse and the perpetuation of inaccuracies that the citizen would never know of, let alone have an opportunity to rebut or correct”); App.4a-7a (providing statutory background). Thus, the Act’s substantive and procedural safeguards prevent the government from creating “centralized Federal information systems” or “interagency computer data banks” that consolidate Americans’ sensitive information across agencies in ways that could endanger our fundamental rights. S. Comm. on Gov’t Operations and H.R. Comm. on Gov’t Operations, 94th Cong., Source Book on Privacy 168, 217, 885 (1976), <https://perma.cc/9W9F-R5ZL>.

Pertinent here, the Privacy Act prohibits “an agency” from “disclos[ing] a record to another agency” or other entity “without the written consent of the person to whom the record pertains,” subject to “certain exceptions.” *FAA v. Cooper*, 566 U.S. 284, 289 n.2 (2012) (citing 5 U.S.C. § 552a(b)). One such exception is for a properly noticed “routine use,” 5 U.S.C. § 552a(b)(3), defined as a use “for a purpose which is compatible with the purpose for which [a record] was collected,” *id.* § 552a(a)(7).

The Act also imposes strict notice-and-comment requirements. When agencies “establish[] or revis[e]” any “system of records,” they must “publish in the Federal

Register . . . a notice,” *id.* § 552a(e)(4)—called a System of Records Notice (“SORN”)—disclosing the system’s contents, functions, uses, and procedures for individuals to access and correct records about themselves. *Id.* Agencies must publish a SORN at least 30 days before “any new use or intended use of the information in the system, and provide an opportunity for interested persons to submit written data, views, or arguments.” *Id.* § 552a(e)(11).

Contemporaneous Privacy Act guidelines issued by the Office of Management and Budget (“OMB”) pursuant to a statutory delegation, *see* 5 U.S.C. § 552a(v)(1), confirm that the Act requires a meaningful opportunity for notice and comment, with a public “explanation of the routine uses and any changes made or not made as a result of the public comment.” Privacy Act Implementation: Guidelines and Responsibilities, 40 Fed. Reg. 28948, 28966 (July 9, 1975), <https://perma.cc/776J-4L46>; *accord* OMB Circular No. A-108, Federal Agency Responsibilities for Review, Reporting, and Publication under the Privacy Act, at 7 & 12 (2016), <https://perma.cc/N9QK-SDLE>.

II. Factual Background

A. The SAVE System and its 2025 Modifications

“Congress created SAVE in 1986, directing DHS’s predecessor to establish an automated means of verifying the immigration status of noncitizens applying for certain public benefits.” App.105a (citing Immigration Reform and Control Act of 1986, Pub. L. No. 99-603, § 121(c)(1), 100 Stat. 3359, 3391 (codified at 42 U.S.C. § 1320b-7(d)). Consistent with SAVE’s statutory purpose of verifying whether “aliens” are eligible for government “benefits,” 42 U.S.C. § 1320b-7(d), for “nearly four decades, SAVE principally searched DHS’s own immigration records,” App.105a. The system did not incorporate records on U.S.-born citizens (as DHS would have no immigration records on them), did not allow searches using Social Security numbers

or access SSA databases, and only allowed queries of one person at a time. *Id.*²

That changed in 2025, when the President issued an Executive Order directing DHS to provide states “access to appropriate systems for verifying the citizenship or immigration status of individuals registering to vote or who are already registered.” Exec. Order No. 14248, § 2(b)(i), 90 Fed. Reg. 14005, 14006 (Mar. 25, 2025). The order also directed SSA to make its Social Security Number Verification Service, Death Master File, and other relevant federal databases available for that purpose. *Id.* § 3(a), 90 Fed. Reg. at 14007.

Soon thereafter, DHS modified SAVE “in three principal respects: (i) it connected SAVE to SSA records and permitted searches using full or partial SSNs; (ii) that connection allowed SAVE to return information about persons—including many U.S.-born citizens—who had no DHS immigration records; and (iii) the system permitted bulk queries.” App.106a; *accord* App.133a (Katsas, J., dissenting).³

As authority for these modifications, DHS’s and SSA’s 2025 agreement for Modified SAVE invoked a 30-year-old statute, 8 U.S.C. § 1373, which the agencies had never previously construed to permit such data sharing. DHS-AR-421. Prior to making the modifications, neither agency published modified SORNs for the relevant systems of records “or otherwise provided an opportunity for the public to comment” as required by the Privacy Act. App.12a.

B. The Modified SAVE Process

Modified SAVE results in federal agencies disclosing, and SAVE users

² Also, before 2025, DHS recognized SAVE as a Privacy Act “system of records,” issued SORNs, and conducted notice and comment before making changes to the system. *See* App.10a (citing eight SAVE SORNs issued between 2001 and 2020).

³ Modified SAVE links directly to SSA’s Master Files (known as NUMIDENT), a highly sensitive system of records with information on over 300 million U.S. citizens, including SSNs, other identifying numbers, names, dates and places of birth, citizenship indicators, and death records. *See* SSA-AR-238; 90 Fed. Reg. 10025, 10026 (Feb. 20, 2025).

accessing, millions of Americans’ sensitive information through a four-step process.

First, a SAVE user (e.g., a state election official) uploads into a web interface a spreadsheet with various data elements (first and last name, date of birth, a full or partial SSN, and the reason for verification) for up to millions of individuals. App.106a.

Second, DHS discloses these data elements to SSA, which uses it to search the SSA Master Files. *Id.*

Third, SSA “generates separate true-or-false match indicators for the SSN, name, and date of birth for each person.” *Id.* SSA sends DHS “match results, as well as yes-or-no indicators capturing whether queried individuals are citizens, deceased, or foreign-born, and other data fields that indicate state or country of birth and alien registration number if applicable and available.” *Id.* And if the user initially “provided only a partial SSN and SSA nonetheless identified a match in its own records, SSA shares the associated full (nine-digit) SSN with DHS for DHS’s own records.” *Id.*

Fourth, Modified SAVE discloses results to the SAVE user. “For each person encompassed by the query, the SAVE results report the name, SSN, date of birth, and other identifying information contained in the request, alongside search results. The search results may include an indicator of citizenship or immigration status, an indicator capturing whether the individual is deceased, and descriptions of errors generated by the search process.” App.107a. These results are disclosed to the end user in a “person-specific . . . SAVE case response.” App.125a; *see* USCIS, FOIA Release, Control No. COW2025005720 (June 26, 2026), <https://perma.cc/23F9-9W8N> (sample SAVE responses).

Under DHS’s standard SAVE user agreement, if Modified SAVE returns an inconclusive or non-U.S. citizen response, DHS instructs SAVE users that they *must* “contact the [individual] to obtain proof of U.S. citizenship.” App.7 (quoting DHS-AR-762); *see also* App.13, 107a; DHS-AR-449. Absent action by that individual, DHS’s

agreement contemplates their voter registration can be canceled. DHS-AR-1526.

C. The Government Admits Modified SAVE’s Citizenship Data Is Incomplete and Unreliable

DHS knew when it modified SAVE that the changes violated the Privacy Act and that, due to “shortfalls in data accuracy,” the modified system could not reliably confirm citizenship for citizens born outside the United States (e.g., naturalized, derived, and acquired citizens).⁴ See App.111a; DHS-AR-260, -277, -302, -319 (DHS “Privacy Threshold Analysis” documents from July and September 2025 finding that SAVE modifications were “not in compliance” with the Privacy Act, and that “[s]hortfalls in data accuracy could cause incomplete or false results”); DHS-AR-240 (DHS “Privacy Impact Assessment” warning Modified SAVE “may share inaccurate information with registered agencies” and “may produce inaccurate results”).

Specifically, Modified SAVE incorporates SSA citizenship data that only reflects a person’s citizenship status when they *applied* for an SSN; that status does not automatically update if the person later naturalizes, nor must the individual report a change in their citizenship status unless applying for SSA benefits. See SSA-AR-103, -44. Thus, a naturalized citizen who applied for a Social Security card or otherwise interacted with SSA before naturalization may be incorrectly identified as a non-citizen in SSA records. See SSA-AR-44 (“[C]itizenship information in SSA’s records might not be current.”); SSA-AR-103 (SSA “citizenship information is accurate for SSA’s program purposes” only; “if used later for other purposes, it may not be current”). Similarly, if an acquired or derived citizen has not obtained a “certificate of United States citizenship” from DHS—which “frequently” is the case,

⁴ Acquired citizenship is “[c]itizenship conferred at birth on children born abroad to a U.S. citizen parent(s).” USCIS, *Acquired citizenship*, Glossary of Terms, <https://perma.cc/8AB4-9LAX>. Derived citizenship is “[c]itizenship conveyed to children through the naturalization of their parents or, under certain circumstances, to foreign-born children adopted by U.S. citizen parents.” USCIS, *Derivative citizenship*, Glossary of Terms, <https://perma.cc/7SXE-ZTYT>.

DHS-AR-259—then “SAVE may not be able to confirm [that individual’s] U.S. citizenship.” DHS-AR-1525; *accord* DHS-AR-1529; DHS-AR-496 n.2.

While the government touts the “millions” of citizenship “verification[s]” Modified SAVE has allegedly enabled, *see* App.4, it has never disclosed Modified SAVE’s error rate, including the number of Americans whose U.S. citizenship Modified SAVE *failed* to confirm, whose status it has misrepresented, and who consequently have been forced to reverify their citizenship to retain their voter registration or obtain government benefits.

The record shows that Modified SAVE has high rates of erroneous non-citizen or non-verification responses (either of which triggers DHS’s directive that voters provide proof of citizenship, *see* App.7). In Travis County, Texas, “twenty-five percent of the non-citizen matches’ in that county were individuals who had already proven citizenship in the United States.” App.35a. The public record reflects that at least 81% of Modified SAVE’s responses to St. Louis County, Missouri were erroneous, with other jurisdictions across the country receiving similarly unreliable SAVE responses.⁵ Respondents’ members are among the victims of Modified SAVE’s stale and faulty citizenship data. *See infra* Argument § I.A.

D. The SAVE Modifications Were Unprecedented

By all accounts, the 2025 SAVE modifications were transformative and unprecedented. *See* App.34-37; App.133a, 136a, 151a-152a (Katsas, J., dissenting). As noted, Congress established SAVE to help verify *non-citizens’* eligibility for government benefits. Consistent with that limited statutory purpose, SAVE previously enabled only individualized searches of non-citizens and “certain

⁵ *See* Jen Fifield & Zach Despart, “Not Ready for Prime Time.” *A Federal Tool to Check Voter Citizenship Keeps Making Mistakes*, ProPublica & Texas Tribune (Feb. 13, 2026), <https://perma.cc/PR4Q-67NR>; Judd Legum & Rebecca Crosby, *The Federal Database That Could Upend the Midterm Elections*, Mother Jones (Apr. 9, 2026), <https://perma.cc/8YXC-WU7U>.

naturalized and derived U.S. citizens” and could not verify U.S. born citizens “under any circumstances.” USCIS, *Voter Registration and Voter List Maintenance Fact Sheet* (Jan. 24, 2025), <https://perma.cc/QW29-JZK8>. By expanding SAVE beyond its statutory design to incorporate SSA’s Master Files and enable bulk searches of U.S.-born citizens, DHS enlarged the population of Americans whose sensitive personal information SAVE accesses by over 1,000%—from about 27 million foreign-born citizens to more than 300 million Americans.⁶ Never before has a government agency created an inter-agency citizenship database centralizing Americans’ sensitive personal information at the scale and scope of Modified SAVE.

III. Procedural Background

Respondents are organizations whose members had their personal information disclosed without their consent and/or were wrongfully identified as non-citizens because of Modified SAVE. App.2a-3a. Some were purged from voter rolls as a result. App.33a. Respondents filed suit in September 2025 to challenge Modified SAVE as substantively and procedurally unlawful, Dkt.1, and moved for preliminary relief, Dkt.16. While that motion was pending, DHS and SSA belatedly published updated SORNs for Modified SAVE. App.13a. Although the SORNs “solicited comments from the public,” they also provided Modified SAVE “would be effective immediately (*i.e.*, before the public could submit comments).” App.13a.

After DHS and SSA produced voluminous administrative records and the

⁶ See U.S. Census Bureau, *Nativity and Citizenship Status in the United States*, <https://data.census.gov/table/ACSDT1Y2023.B05001?q=B05001> (accessed Feb. 23, 2026) (estimating about 25 million naturalized citizens in United States); Sarah Miller, *Estimates of the Lawful Permanent Resident Population in the United States and the Subpopulation Eligible to Naturalize: 2024 and Revised 2023*, Office of Homeland Sec’y Statistics, at 3 (Sept. 2024), <https://perma.cc/E4TP-6FWX> (estimating some 2 million lawful permanent residents who derived citizenship from a parent since 1980); SSA-AR-238 (SSA Master Files include information on “easily over 300 million” Americans).

parties engaged in comprehensive summary judgment briefing, the court entered summary judgment for Respondents on multiple claims. App.1a. The court found that Respondents League of Women Voters (“LWV”) and League of Women Voters Texas (“LWVTX”) had associational standing based on their members’ privacy, reputational, voting, and procedural injuries. App.23a-40a.⁷ On the merits, the court held Modified SAVE and the associated SORNs “unlawful in several respects”: they violated the Social Security Act’s prohibition against “disclosure of Social Security numbers and other related SSA records,” substantive and procedural protections of the Privacy Act, and the APA. App.3a.⁸ The court also rejected the government’s claims about the impact of litigation in the Northern District of Florida between four plaintiff states and DHS (but not SSA), *see Florida v. DHS*, No. 24-cv-00509 (N.D. Fla.) (“*Florida*”), finding it lacked authority to enforce another court’s consent decree and, even if it could, “comity does not favor dismissing or abstaining in this circumstance.” App.72a.⁹ The court therefore “set[] aside and vacate[d] the 2025

⁷ Because these “injuries suffice[d] to confer standing,” the court did not address Respondents’ organizational and informational standing. App.23a n.5.

⁸ Because relief was “warranted on these [statutory] claims,” the court did not address Respondents’ constitutional claims. App.21a.

⁹ In *Florida*—four months after DHS internally acknowledged its SAVE modifications were “not in compliance” with the Privacy Act, DHS-AR-319, -326, two months after Respondents filed this suit, and eleven days after the district court wrote it “doubt[ed] the lawfulness of the Government’s actions,” Dkt.55 at 1—four plaintiff states and DHS executed a consent decree purporting to *require* DHS to maintain Modified SAVE. After the district court here vacated the SAVE modifications, the *Florida* court granted the plaintiffs’ motion to enforce their consent agreement with DHS, ordering DHS to reinstate those states’ access to Modified SAVE despite the contrary vacatur order in this case, and despite the lack of adversarial proceedings in *Florida* over the lawfulness of Modified SAVE. Respondents LWV and EPIC intervened in *Florida* to appeal the district court’s enforcement order. *See Florida v. League of Women Voters*, No. 26-12533 (11th Cir.). That appeal is ongoing.

SAVE modified system and the related [SORNs].” App.3a; *see also* App.74a-77a.¹⁰

The government appealed and moved to stay the order pending appeal. Dkt.113; Dkt.116. The district court denied the stay motion. App.78a. It affirmed its prior conclusions, and it held that the government’s newly advanced arguments about the Social Security Act were unlikely to succeed because they were forfeited. App.81a. The court found that any injuries to the government were “minimal” and “self-inflicted,” App.90a, 92a, and that the *Florida* court “had no authority to make merits determinations about the legality of SAVE” in entering a consent decree, App.91a-96a; *accord* App.119a.

The court of appeals also denied a stay. The court found Respondents’ members face “cognizable” voting injuries that are “sufficiently likely to establish their standing,” “fairly traceable” to Modified SAVE, and “redressable” by “setting [it] aside.” App.110a-112a. On the merits, the court found that the government forfeited “what are now its central arguments” under the Social Security Act, having first raised them in their post-judgment stay motion and declined the district court’s “express[]” invitation to “submit a post-judgment motion to excuse the forfeiture and receive full consideration of the late-raised arguments.” App.104a. The court also rejected the government’s claim of authority under 8 U.S.C. § 1373(c). App.120a-122a. Finally, the court concluded that the government failed to make “the requisite strong showing of a likelihood of success” even if its forfeiture were excused. App.122a-130a.

ARGUMENT

To obtain a stay pending appeal, the “applicant must show that it is likely to succeed on the merits of its appeal, that [this Court] would likely grant certiorari to review any decision to the contrary, that it will likely suffer irreparable harm in the

¹⁰ The district court permitted the State of Texas, a SAVE user, to intervene as a defendant, and Texas participated in dispositive motion briefing below. App.18a. Texas separately appealed the district court judgment but has not sought a stay.

interim, and that the balance of equities tip in its favor.” *Trump v. Cook*, 146 S. Ct. 2234, 2246 (2026). Such relief is extraordinary and granted “only ‘upon the weightiest considerations.’” *Packwood v. Senate Select Comm. on Ethics*, 510 U.S. 1319, 1320 (1994) (Rehnquist, C.J., in chambers) (cleaned up). An applicant bears an “especially heavy burden” where, as here, “the Court of Appeals denied [its] motion for a stay.” *Id.* at 1320. The government fails to meet this burden.

I. The Government is Unlikely to Succeed on the Merits

A. Respondents Have Standing

Respondents have associational standing on behalf of their members based on voting, privacy, and reputational injuries caused by Modified SAVE. The government is not likely to show otherwise.

Voting Injuries. Modified SAVE harms Respondents’ members’ voting rights, with its continued operation substantially increasing the risk of forced verification of citizenship, deregistration, and even disenfranchisement—as reflected in the opinion of every judge who addressed this issue below. *See* App.31a-38a (Sooknanan, J.); App.110a-112a (Srinivasan, C.J., and Wilkins, J.); *cf.* App.139a, 153a (Katsas, J., dissenting) (not disputing standing).

Because Modified SAVE discloses inaccurate citizenship data to SAVE users, Respondents’ members who are naturalized and derived citizens have been forced to provide documentary proof of citizenship to maintain their voter registrations, with some having their registrations wrongfully cancelled. *See* App.110a-112a. And similarly situated members across the country will face the same harms if the government is allowed to resume use of Modified SAVE. *See id.* These burdens on the fundamental right to vote, including the substantial risk of future burdens if Modified SAVE continues, easily establish standing. *See Meese v. Keene*, 481 U.S. 465, 475 (1985) (“[T]he need to take . . . affirmative steps to avoid the risk of harm . . . constitutes a cognizable injury.”); *Gill v. Whitford*, 585 U.S. 48, 65-66 (2018)

(“[V]oters who allege facts showing disadvantage to themselves as individuals have standing to sue’ to remedy that disadvantage.”); App.111a (“If a person needs to prove their citizenship to remain registered to vote or if they are removed from the registration rolls, they suffer a cognizable injury.”); App.32a-36a (citing cases).

The government disputes neither the facts underpinning these voting injuries, nor the injuries’ legal sufficiency. Instead, it focuses on traceability and redressability by denying that its actions are responsible for Respondents’ members’ injuries. App.12-16. But the government misstates the law. “Article III ‘requires no more than *de facto* causality.’” *Dep’t of Com. v. New York*, 588 U.S. 752, 768 (2019). This Court has repeatedly recognized that a plaintiff has standing if “‘third parties will likely react’ to the government [action] ‘in predictable ways’ that will likely cause . . . the plaintiff’s injury.” *Diamond Alt. Energy, LLC v. EPA*, 606 U.S. 100, 112 (2025) (cleaned up). And even “‘a partial remedy’ satisfies the redressability requirement.” *Uzuegbunam v. Preczewski*, 592 U.S. 279, 291 (2021).

These standards are easily met here. As found below, “the undisputed record shows that the [Respondents]’ members suffer th[e] injury [of burdens on their franchise] because SAVE records show that they are not United States citizens.” App.37a (cleaned up); *see also* App.110a-112a. “It is hardly surprising that additional voter verification and potential voter disenfranchisement is ‘the predictable effect of the federal government incorrectly informing a state that an individual may be ineligible to vote.’” App.37a-38a; *see also* App.112a (“states’ response to an adverse SAVE result is not conjectural”). Indeed, the government concedes this is the intended effect: DHS agreements instruct users of Modified SAVE that they “*must* contact the registrant or registered voter to obtain proof of U.S. citizenship” if SAVE cannot confirm citizenship. DHS-AR-762 (emphasis added); App.13. And the ordered relief redresses Respondents’ harms because it prospectively halts the unlawful use of Modified SAVE that has burdened, and would continue to burden, Respondents’

members' voting rights. *See* App.112a.

Article III does not require plaintiffs to eliminate all hypothetical alternative causes of a future injury. *Contra* App.13 (speculating that, even without Modified SAVE, states might hypothetically demand proof of citizenship or revoke registrations for other reasons). Respondents need only show that Modified SAVE is a “*de facto* caus[e]” of their injuries. *Dep’t of Com.*, 588 U.S. at 768. Through un rebutted evidence, they have done exactly that. *See* App.37a; App.110a-112a.

Applicants incorrectly assert that the courts below “never found” Modified SAVE “less accurate” than the old SAVE and that Respondents cannot be injured by Modified SAVE because it is “*more* accurate.” App.14. In reality, the courts below made extensive findings regarding Modified SAVE’s inaccuracies. *See* App.35a-37a; App.110a-112a. These findings are based on the government’s own acknowledgment of “[s]hortfalls in data accuracy’ in SSA citizenship data” that “could produce ‘incomplete or false results.’” App.111a (quoting DHS-AR-260, -302); *see also supra* Statement § II.C.

Applicants also wrongly claim that Respondents cannot be harmed by Modified SAVE because “the old SAVE system would provide the *same* (non-)response” as Modified SAVE. App.15. This ignores substantial differences in the scope and intended use of the two systems. As the government recognizes, the pre-2025 SAVE system (which Congress authorized for assessing *non-citizens*’ eligibility for *benefits*) did not easily enable wholesale review of voter rolls because it did not allow bulk searches and “could not verify citizenship status without a DHS-specific immigration identifier, . . . which States do not always know, and which natural-born citizens do not have.” App.6; *accord* App.135a (Katsas, J., dissenting). Because statewide voter registration lists do not include DHS-issued identifiers, *see* App.6, the government’s speculation that the pre-2025 SAVE would (or could) have caused the “same” harms is highly implausible and refuted by the historical record of pre-2025 SAVE usage.

Modified SAVE's ability to ingest and search Americans' data at a much higher volume, its facilitation of SSN-based searches and incorporation of unreliable SSA citizenship data, and DHS's directive that state users must seek proof of citizenship from individuals who cannot be verified by the new system all burden voting rights in unprecedented ways.¹¹

The un rebutted record below establishes that Modified SAVE causes Respondents' members' voting injuries, and that "[r]everting SAVE to its prior functionality" would "likely redress" those harms. App.38a.

Privacy Injuries. The members of Respondents LWV and LWVTX also suffered concrete injuries when Applicants disclosed their information (including SSNs and citizenship status) from SSA records in violation of the Privacy Act and Social Security Act. App.24a. These disclosures occurred not only *within* the federal government, *contra* App.16-17, but also to Texas, Louisiana, and other SAVE users. App.24a, 107a, 126a-130a. Such intangible harms are "concrete" for Article III standing because they bear "a close relationship to harms traditionally recognized as providing a basis for lawsuits in American courts." *TransUnion LLC v. Ramirez*, 594 U.S. 413, 425 (2021). A "close relationship" is enough; concreteness "do[es] not require an exact duplicate." *Id.* at 433. The district court correctly concluded that both intrusion upon seclusion and breach of confidence provide such an analogue here.

TransUnion expressly recognized that "intrusion upon seclusion" provides a basis for lawsuits in American courts. *Id.* at 425. The tort's relevant elements are "intentional[]" intrusion, "physically or otherwise, upon the . . . private affairs or concerns" of another which "would be highly offensive to a reasonable person."

¹¹ Applicants fault Respondents for not providing more examples of the harms inflicted by Modified SAVE. App.13, 15. But Respondents need not provide evidence of every American citizen—or even every one of its members—whose voting rights are or will be burdened by Modified SAVE to demonstrate standing. This was true at the merits stage below and certainly is true in the emergency stay posture. App.36a.

Restatement (Second) of Torts § 652B (Am. Law. Inst. 1977). The intrusion itself triggers liability; the tort requires neither publication of information obtained nor even the subject’s knowledge that an intrusion has occurred. *See id.* cmt. b, illus. 1–5; cmt. c, illus. 7; *see also Am. Fed’n of State, Cnty. & Mun. Emps., AFL-CIO v. Soc. Sec. Admin.*, 172 F.4th 361, 370-71 (4th Cir. 2026) (en banc); *contra* App.17.

“Breach of confidence”—a tort with roots in equity—is also a traditionally recognized basis for a lawsuit. *See, e.g., Corliss v. E.W. Walker Co.*, 64 F. 280 (D. Mass. 1894) (recognizing “violation of confidence” as allowing equitable relief). “The equitable jurisdiction in cases of breach of confidence is ancient.” *Coco v. A.N. Clark (Engineers) Ltd.*, [1968] F.S.R. 415, 419 (Ch.) (Eng.). Today recognized as a tort, “breach of confidence” is actionable where a person offers private information to a third party in confidence and the third party reveals that information. *Jeffries v. Volume Servs. Am., Inc.*, 928 F.3d 1059, 1064 (D.C. Cir. 2019).

A person’s SSN and specific citizenship or immigration status are precisely the kinds of sensitive personal information the unauthorized disclosure of which is offensive to a reasonable person. Indeed, Respondents’ members attested below that they provided this private information in confidence as part of their Social Security applications and reasonably expected SSA to keep it confidential. *See* App.24a; *see also* SSA Disclosure Policy, *supra* p.4 (assuring the public that SSA lacks “legal authority to disclose information about U.S. citizens to DHS” and will not do so).

Applicants rely on the forfeited argument that SAVE discloses only whether the government can confirm citizenship. App.16. This is belied by the lower courts’ findings. *See* App.43a, 81a-85a, 126a-130a. Through Modified SAVE, SSA discloses SSNs and SSA citizenship data to DHS, and verifies SSNs and discloses citizenship data to SAVE user states. *See supra* Statement § II.B. Under SSA policy, verification of an SSN constitutes disclosure. *See* SSA Disclosure Policy, *supra* p.4; *see also* App.127a (“There are sound reasons to think verification of that kind might

well amount to a ‘disclos[ure]’ of an SSN for purposes of § 405(c)(2)(C)(viii)(I)’); *infra* Argument § I.B. Applicants conceded this in the district court, which found there was “no question that the modified SAVE system violates” the Social Security Act because it discloses “both [SSNs] and related records maintained by SSA.” App.43a; *see also* App.128a. As the courts below also found, SSA provides to DHS, and SAVE provides to user states, a specific search result about a person’s citizenship or immigration status, not a generalized statement whether or not the government can confirm citizenship. *See* App.16a-17a; 107a.

It is irrelevant that Applicants’ disclosures were not made to the general public. *Contra* App.17. As explained above, intrusion upon seclusion requires *no* disclosure of the information at issue. And breach of confidence requires only disclosure to any third party. Modified SAVE disclosures are made to such third parties, including SAVE user states.

This Court has noted that “[b]ecause the [Privacy] Act serves interests similar to those protected by defamation and privacy torts, there is good reason to infer that Congress relied upon those torts in drafting the Act.” *Cooper*, 566 U.S. at 295. And it has explained that “[i]n determining whether a harm is sufficiently concrete to qualify as an injury in fact . . . Congress’s views may be ‘instructive.’” *TransUnion*, 594 U.S. at 425 (quoting *Spokeo, Inc. v. Robins*, 578 U.S. 330, 341 (2016)). Congress can “elevat[e] to the status of legally cognizable injuries concrete, de facto injuries.” *Spokeo*, 578 U.S. at 341. It did so in establishing the privacy protections of the Privacy Act and Social Security Act. The government is therefore not likely to prevail on its arguments concerning the concreteness of Respondents’ privacy injuries.

Reputational Injuries. Respondents also have standing because Modified SAVE inflicts harms on their members similar to those actionable as defamation. *See TransUnion*, 594 U.S. at 425. As the district court found, on an undisputed record, Modified SAVE disseminated “‘inaccurate information’ falsely indicating” that

several LWVTX and EPIC members were not citizens. App.30a. “Under longstanding American law, a person is injured when a defamatory statement ‘that would subject him to hatred, contempt, or ridicule’ is published to a third party.” *TransUnion*, 594 U.S. at 432. Publishing false or misleading information about citizenship status for registered voters is analogous to defamation because it carries the implication of serious criminal activity. *See id.* at 432 (misleading information labeling people as “potential . . . serious criminals” was sufficiently analogous to defamation); 18 U.S.C. § 611 (criminalizing non-citizen voting); 18 U.S.C. § 1015(f) (criminalizing non-citizen voter registration).

The government argues that Modified SAVE does no more than say it cannot confirm a person’s citizenship. App.17. Not so. The government conceded below—and the district court correctly found, based on the undisputed record—that SAVE affirmatively reports individuals’ purported immigration status (e.g., “Lawful Permanent Resident”). App.16a-17a; *see also* App.107a; USCIS FOIA Release (June 26, 2026), <https://perma.cc/23F9-9W8N>. And where the records are inconclusive as to an individual’s status, Modified SAVE indicates this fact, effectively flagging them as a potential non-citizen, and instructing the SAVE user “to obtain proof of U.S. citizenship” from the individual. App.17a-18a. In either situation, SAVE plainly communicates more than a mere inability to verify citizenship. And where that information is false—as was the case for several of Respondents’ members who were lawfully registered voters, *see* App.25a—those statements are defamatory.

Finally, the government’s traceability and redressability arguments fail for the reasons detailed above. *See supra* Argument § I.A (Voting Injuries). The fact that Modified SAVE can verify citizenship for a greater number of people overall, App.18, has no bearing on whether these particular members suffered reputational harms

that are traceable to SAVE’s faulty and error-prone operation.¹²

B. The SAVE Modifications Violated the Social Security Act

Applicants cannot establish a strong likelihood of reversing the ruling that Modified SAVE violates a provision of the Social Security Act prohibiting any “officer or employee of the United States” from disclosing “[s]ocial security account numbers and related records that are obtained or maintained . . . pursuant to any provision of law enacted on or after October 1, 1990.” 42 U.S.C. §§ 405(c)(2)(C)(viii)(I), (III).

1. Applicants forfeited the only arguments they now press about § 405(c). *See* App.112a-120a. And this failure was not for lack of opportunity. Respondents’ summary judgment briefing raised these arguments’ mirror image, asserting that Modified SAVE violates § 405(c) because the government is “collecting, verifying, and disclosing SSNs and related records en masse through overhauled SAVE, . . . and they are doing so under [8 U.S.C.] § 1373, a statute enacted ‘after October 1, 1990.’” Dkt.66-1 at 32-33 (quoting § 405(c)(2)(C)(viii)(I)); *contra* App.30-32. The government responded with its own cross-dispositive motion but did not raise its current argument at any point. *See* Dkt.77-1 at 49-50; Dkt.106 at 28-29. It did not do so until *after entry of final judgment*, in a stay motion. And then, after “the district court declined to consider” the government’s new arguments in the expedited stay posture “but expressly invited the government to submit a post-judgment motion to excuse the forfeiture and receive full consideration of the late-raised arguments,” the

¹² Respondents LWVTX and LWVLA also have organizational standing based on the “perceptibl[e]” harms Modified SAVE causes to their “core” voter-services “activities.” *FDA v. All. for Hippocratic Med.*, 602 U.S. 367, 396 (2024). Modified SAVE interferes with LWVTX’s and LWVLA’s core work to ensure voter access and participation, by misidentifying voters as potential non-citizens who must then take additional steps to register or remain registered, and by forcing the organizations to expend greater resources to counteract that harm. *See* Dkt.66-1 at 20-22; Dkt.99 at 2-3; *see also Colorado Montana Wyoming State Area Conf. of the NAACP v. Smith*, 180 F.4th 1266, 1275 (10th Cir. 2026) (voter-services organizations had standing to challenge conduct that interfered with their direct-services programs) (citing cases).

government ignored that “invitation” and sought a stay from the court of appeals “based in significant part on the forfeited arguments.” App.104a, 109a-110a.

This Court “‘normally declines to entertain’ arguments ‘forfeited’ by the parties.” *Ohio*, 603 U.S. at 298-99. And the reasons for not doing so are heightened in the emergency stay posture, where the government is asking the Court “to doubly exercise discretion in its favor.” App.114a-115a. Like the court of appeals, this Court should decline “to take the highly unusual step of considering the government’s forfeited arguments at this preliminary stage,” especially since “a subsequent merits panel remains free to decide for itself whether to entertain the arguments after full appellate briefing.” App.120a.

2. The court of appeals also correctly held that Applicants’ forfeited § 405(c) arguments, even if considered, would not justify a stay. App.122a-130a. As the government recognizes, § 405(c) demands separate analyses as to SSA’s and DHS’s disclosures through Modified SAVE, either of which could violate § 405(c). App.30-31.

As to SSA, Applicants argue § 405(c) is inapplicable because SSA “obtains and maintains its relevant records pursuant to laws enacted well before 1990.” App.31. But, as in the courts below, they fail to identify *which* pre-1990 “laws” they are relying upon. App.123a. Rather than citing a statute, the government only “cites an article written by an SSA employee that recounts the history of the SSN.” *Id.* Yet even that article indicates SSA sometimes obtains and maintains SSNs and related records under post-1990 laws. App.124a (citing statutes). By failing to identify *any* statute under which the relevant SSA records are obtained and maintained, the government does not provide “adequate support for the proposition its argument requires: that the particular SSNs and related records implicated by modified SAVE are neither obtained nor maintained [by SSA] pursuant to any post-1990 law.” App.125a. And if § 405(c)’s temporal requirement is met, SSA indisputably is *disclosing* protected records through Modified SAVE in violation of the statute, including by “giv[ing] DHS

a full SSN that DHS did not previously possess” when SAVE users run a search using “only a partial SSN.” App.126a-27a.

As to DHS, the government’s arguments are even weaker. Its primary position is that a later-enacted statute, 8 U.S.C. § 1373, impliedly repealed § 405(c) in relevant part and thus provides a “complete defense” to Respondents’ § 405(c) claim. App.31. But that implied repeal argument fails for the reasons explained below. *See infra* Argument § I.C; App.120a-121a. And because Congress enacted § 1373 in 1996, the government has necessarily conceded that DHS *does* “obtain[]” and “maintain[]” SSNs and “related records” from SAVE users and SSA through Modified SAVE pursuant to a “law enacted on or after October 1, 1990.” *See* App.125a. Thus, with respect to DHS, there is no dispute that § 405(c)’s temporal requirement is met.

Applicants next argue that, even if DHS is *obtaining* protected SSA records pursuant to a post-1990 statute through Modified SAVE, DHS is not *disclosing* those records in violation of § 405(c). App.31-32. But that is wrong for several reasons. First, when a SAVE user runs a search using a full or partial SSN, DHS indisputably discloses those SSNs to SSA to enable a search of SSA’s records. *See* App.106a, 126a-127a. That is one prohibited disclosure. Next, when DHS transmits the results of SSA’s search to the SAVE user, that too is a prohibited disclosure, both because it verifies that the supplied SSN matches SSA’s records and because it discloses “related records” concerning the individual’s citizenship status. *See* App.16a-17a; App.107a, 125a; USCIS FOIA Release (June 26, 2026), <https://perma.cc/23F9-9W8N>. Indeed, under SSA policy, verifying SSNs through match responses is equivalent to disclosing SSNs. *See* SSA Disclosure Policy, *supra* p.4. And while the court of appeals did not definitively resolve the question, it explained at length why “[t]here are sound reasons to think verification of [this] kind might well amount to a ‘disclos[ure]’ of an SSN for purposes of § 405(c)(2)(C)(viii)(I).” App.127a-128a.

Equally unavailing is the government’s claim that DHS is not disclosing

“related [SSA] records” to SAVE users within the meaning of § 405(c) when disclosing citizenship status, because the disclosed information does not “reveal[] anyone’s identity.” App.31. The court of appeals correctly rejected this unduly “narrow” reading of § 405(c). App.129a-130a. The statute defines a “related record” as “any record, list, or compilation that indicates, directly or indirectly, the identity of any individual” for whom an SSN or request for one is maintained. 42 U.S.C. § 405(c)(2)(C)(viii)(IV). “The records produced by modified SAVE seem to fit the definition as written,” because “the ‘SAVE case response’ DHS sends to a user ‘includes the data elements used to create the case’ together with additional citizenship or immigration information,” and “[a] record that links a person’s submitted name, date of birth, and SSN to a citizenship response can indicate whose information it reports even if the citizenship field itself contains no name.” App.129a-130a.

Thus, “the government has not made a strong showing that the records disclosed through modified SAVE fall outside § 405(c)(2)(C)(viii)(IV).” App.130a.¹³

C. Applicants Lacked Statutory Authority for the SAVE Modifications

An “agency . . . literally has no power to act . . . unless and until Congress authorizes it to do so by statute.” *FEC v. Cruz*, 596 U.S. 289, 301 (2022). That is because “[a]dministrative agencies are creatures of statute,” and “accordingly possess only the authority that Congress has provided.” *Nat’l Fed’n of Indep. Bus. v. Dep’t of*

¹³ Modified SAVE likewise violates the Social Security Act’s separate prohibition on SSA’s “disclosure . . . of any file, record, report, or other paper, or any information . . . except as . . . agency . . . regulations prescribe and except as otherwise provided by Federal law.” 42 U.S.C. § 1306(a). As explained below, no statute or SSA regulation authorizes the agency to disclose SSA information to DHS and SAVE users through Modified SAVE. *See infra* Argument § I.C; SSA Disclosure Policy, *supra* p.4 (confirming SSA lacks “legal authority to disclose information about U.S. citizens to DHS”).

Lab., 595 U.S. 109, 117 (2022) (per curiam). To determine “whether an agency has acted within its statutory authority,” courts use “the traditional tools of statutory construction.” *Loper Bright Enters. v. Raimondo*, 603 U.S. 369, 403, 412 (2024). Here, DHS and SSA invoke two statutes to justify their 2025 SAVE modifications: the Immigration Reform and Control Act of 1986 (“IRCA”), Pub. L. No. 99-603, 100 Stat. 3359, and the Illegal Immigration Reform and the Immigrant Responsibility Act of 1996 (“IIRIRA”), Pub. L. No. 104-208, 110 Stat. 3009-546. Neither statute authorizes Modified SAVE. *See* App.120a-121a; App.65a-72a.

1. The IRCA amended the Social Security Act by directing DHS’s predecessor to create a “system”—later established as SAVE—“for the verification of immigration status under paragraphs (3) and (4)(B)(i) of section 1137(d) of the Social Security Act [42 U.S.C. 1320b-7(d)(3), (4)(B)(i)].” 42 U.S.C. § 1320b-7 note. The system’s purpose is to help evaluate whether “an individual who is *not* a citizen or national of the United States” is eligible for certain “benefits.” *Id.* §§ 1320b-7(d)(3)-(4) (emphasis added).¹⁴ These provisions govern benefits, not voter eligibility, and only apply to applicants who are *not* U.S. citizens—hence the name “Systematic *Alien* Verification for *Entitlements*” program. Indeed, the statute instructs that users of the system “shall utilize the individual’s *alien file or alien admission number*”—not an SSN—“to verify with [DHS] the individual’s immigration status.” *Id.* § 1320b-7(d)(3) (emphasis added). Nothing in the IRCA authorizes using SAVE to verify individuals’ U.S. citizenship using SSNs.

2. The government chiefly relies on 8 U.S.C. § 1373, a section of the IIRIRA. Section 1373 consists of three subsections—each of which addresses a discrete point,

¹⁴ The government omits that the specific “system” authorized by the IRCA is not just any system for verifying immigration status, but rather the one described in “paragraphs (3) and (4)(B)(i) of section 1137(d) of the Social Security Act.” 42 U.S.C. § 1320b-7 note; *see* App.5 (omitting statutory text with an ellipsis).

and none of which support the government’s position. Section 1373(a) provides that, “[n]otwithstanding any other provision of” law, a “government entity or official may not prohibit, or in any way restrict, any government entity or official from sending to, or receiving from, [DHS] information regarding the citizenship or immigration status, lawful or unlawful, of any individual.” 8 U.S.C. § 1373(a). Section 1373(b) provides that, “[n]otwithstanding any other provision of” law, “no person or agency may prohibit, or in any way restrict,” a government entity from sending, requesting, exchanging, or maintaining “information regarding the immigration status, lawful or unlawful, of any individual.” *Id.* § 1373(b). And § 1373(c) provides that DHS “shall respond to an inquiry by a . . . government agency, seeking to verify or ascertain the citizenship or immigration status of any individual within the jurisdiction of the agency for any purpose authorized by law, by providing the requested verification or status information.” *Id.* § 1373(c).

The government mashes these discrete subsections together, construing the “notwithstanding” clauses of subsections (a) and (b) to apply to subsection (c) (even though it has no such clause), and insisting that § 1373 *as a whole* nullifies any provision of the U.S. Code that might restrict DHS’s acquisition and disclosure of information under § 1373, including the Social Security Act and Privacy Act. App.22-23. But that boundless reading of § 1373 defies traditional rules of construction and the Executive’s own longstanding interpretation of the statute.

Start with § 1373(a) and § 1373(b). Those subsections use purely prohibitory language, stating government entities “*may not* prohibit, or in any way restrict” certain action. Prohibitory language such as “shall not” or “may not” is not “an affirmative grant of power.” *See New England Power Co. v. New Hampshire*, 455 U.S. 331, 341 (1982). Nothing in § 1373(a) or § 1373(b) affirmatively empowers DHS and SSA to freely exchange data for purposes of verifying “citizen and immigration status,” despite the web of preexisting statutory restrictions on such inter-agency

disclosures. And the “Executive Branch interpretation . . . issued roughly contemporaneously with enactment of the statute” and “the longstanding ‘practice of the government’” since the IIRIRA’s enactment confirms as much. *Loper Bright*, 603 U.S. at 386; see *Relationship Between Illegal Immigr. Reform & Immigrant Resp. Act of 1996 & Statutory Requirement for Confidentiality of Census Info.*, 1999 WL 34995963, *4-*6 (O.L.C. May 18, 1999) (recognizing that neither § 1373(a) nor § 1373(b) “clearly invest[s]” agencies with “affirmative authority to disclose information in circumstances where they otherwise would be prohibited from doing so by a federal statute”); *supra* Statement § II.A.¹⁵

Nor does § 1373(c) authorize Modified SAVE. To start, § 1373(c) speaks solely to *DHS’s* obligations and confers no authority whatsoever on *SSA*. That point is dispositive here because, absent express authorization, the Social Security Act *prohibits SSA* from disclosing *its* records outside of the agency, see *supra* Argument § I.B, and Modified SAVE *cannot operate* without *SSA* doing so, see *supra* Statement § II.B.

Even as to *DHS*, the court of appeals correctly held its “general duty to answer a citizenship inquiry under 8 U.S.C. § 1373(c) does not by itself authorize disclosure of information” that other statutes “specifically make[] confidential.” App.121a. The government’s contrary position—that § 1373(c) “overrides” disclosure restrictions of the Social Security Act and Privacy Act, App.3—runs headlong into the “strong presumption that repeals by implication are disfavored and that Congress will specifically address preexisting law when it wishes to suspend its normal operations in a later statute.” *Epic Sys. Corp. v. Lewis*, 584 U.S. 497, 510 (2018) (cleaned up). “A

¹⁵ That the heading of § 1373(b) reads “Additional Authority of Government Entities,” see App.20, does not change this conclusion, because statutory “headings” cannot “take the place of the detailed provisions of the text.” *Lawson v. FMR LLC*, 571 U.S. 429, 446 (2014).

party seeking to suggest that two statutes cannot be harmonized, and that one displaces the other, bears the heavy burden of showing a *clearly expressed congressional intention* that such a result should follow.” *Id.* (emphasis added). The government cannot meet this “heavy burden.” Indeed, nothing in § 1373(c) “expressly contradict[s]” the earlier-enacted statutes. *Nat’l Ass’n of Home Builders v. Defs. of Wildlife*, 551 U.S. 644, 662 (2007). Nor is the government’s reading “absolutely necessary . . . in order that [the] words [of the later statute] shall have any meaning at all.” *Id.* Rather, all statutes peacefully coexisted for decades until Applicants’ haphazard “overhaul” of SAVE in 2025. *See supra* Statement §§ II.A, II.D; App.10a & n.1. Because the government cannot show the statutes “are in ‘irreconcilable conflict,’” or that “the latter Act covers the whole subject of the earlier one and ‘is clearly intended as a substitute,’” *Branch v. Smith*, 538 U.S. 254, 273 (2003) (plurality), it cannot overcome the “strong presumption” against implied repeals.

In arguing otherwise, the government points to the “notwithstanding” clauses found in the *other* subsections of § 1373. *See* App.22 (citing 8 U.S.C. §§ 1373(a)-(b)). But Congress *omitted* that language from § 1373(c). The government effectively asks this Court to rewrite § 1373(c) to say: “*Notwithstanding any other provision of law*, DHS shall respond to an inquiry” But rules of construction compel the exact opposite reading. Where, as here, “Congress includes particular language in one section of a statute but omits it in another section of the same Act, it is generally presumed that Congress acts intentionally and purposely in the disparate inclusion or exclusion.” *City & County of San Francisco v. EPA*, 604 U.S. 334, 344 (2025); *accord* App.29 (citing *Jama v. ICE*, 543 U.S. 335, 341 (2005)). This Court “must give effect to the text Congress enacted.” *Ali v. BOP*, 552 U.S. 214, 228 (2008).

The overall scheme of the IIRIRA further refutes the government’s reading of

§ 1373. Another section of the IIRIRA, creating the E-Verify program,¹⁶ demonstrates “Congress knew how to” permit data sharing and matching between DHS and SSA “when it wanted to” and that it chose not to in § 1373. *Jones v. Bock*, 549 U.S. 199, 222 (2007) (applying canon in a different context). In the E-Verify provisions of the IIRIRA, “Congress expressly authorized SSA to participate in an employment-verification system by matching names and SSNs against its records; specified what information SSA could return; and restricted how that information could be used.” App.121a (citing IIRIRA, Pub. L. No. 104-208, § 404(e), (h), 110 Stat. 3009-546, 3009-665 (codified at 8 U.S.C. § 1324a note)). “Section 1373(c) contains no comparable reference to SSA records, SSN matching, or the Social Security Act’s confidentiality rule.” *Id.* That omission is a “manifestation of a considered congressional judgment.” *United States v. Fausto*, 484 U.S. 439, 448 (1988); *accord City & County of San Francisco*, 604 U.S. at 344. There is “little basis to read § 1373(c)’s general instruction to answer citizenship inquiries as both silently accomplishing the same thing” as the IIRIRA’s E-Verify provisions “and silently displacing an otherwise applicable confidentiality restriction.” App.121a.

3. The major questions doctrine and its “clear statement” rule doubly confirm this conclusion. *Biden*, 600 U.S. at 506. By transforming SAVE into a first-of-its-kind master database of U.S. citizens and expanding the population of Americans whose sensitive information SAVE accesses by over 1,000%, *see supra* Statement § II.D, DHS and SSA “claim[ed] to discover in . . . long-extant statute[s] an unheralded power’ representing a ‘transformative expansion [of their] . . . authority’” on matters

¹⁶ “Originally known as the Basic Pilot Program, E-Verify is an internet-based system that allows an employer to verify an employee’s work-authorization status.” *Chamber of Com. of United States v. Whiting*, 563 U.S. 582, 590 (2011) (cleaned up). While SAVE and E-Verify utilize the same “underlying technology”—DHS’s “Verification Information System”—they are distinct programs subject to different legal authorities and parameters. DHS-AR-94.

of “vast . . . political significance.” *West Virginia v. EPA*, 597 U.S. 697, 716, 724 (2022).

Between SAVE’s creation in 1986 and 2025, DHS and SSA never claimed (and in fact *disavowed*) the power to use SAVE for verifying the citizenship status of natural-born citizens, let alone the power to do so free of all constraints imposed by federal privacy laws. *See supra* Statement §§ II.A, II.D; SSA Disclosure Policy, *supra* p.4 (stating SSA does “not have the legal authority to disclose information about U.S. citizens to DHS”). The “lack of historical precedent” for the agencies’ actions, “coupled with the breadth of authority that [they] now claim[], is a ‘telling indication’ that the SAVE modifications ‘extend[] beyond the [agencies’] legitimate reach.’” *Nat’l Fed’n of Indep. Bus.*, 595 U.S. at 119.

Confirming the “political significance” of the agencies’ actions, multiple bills have been introduced in Congress to authorize the SAVE modifications. *See* SAVE Act, H.R. 8281, 118th Cong., 2d Sess., § 2(f) (2024) (bill authorizing use of SAVE for bulk voter verification and directing that all agency heads “shall share information with each other” to enable voter verification inquiries); *accord* SAVE Act, H.R. 22, 119th Cong., 1st Sess., § 2(f) (2025); SAVE America Act, H.R. 7296, 119th Cong., 2d Sess. § 2(f) (2026). But none have passed the Senate. The agencies thus have “conveniently . . . enact[ed] a program’ that Congress has chosen not to enact itself.” *Biden*, 600 U.S. at 504 (quoting *West Virginia*, 597 U.S. at 713).

Because Applicants cannot point to any “‘clear congressional authorization’ for the power [they] claim[ed]” in modifying SAVE, *West Virginia*, 597 U.S. at 723, the major questions doctrine confirms they exceeded their authority. And that lack of statutory authorization dooms the government’s likelihood of success on the merits.

D. The SAVE Modifications Were Arbitrary and Capricious

The district court correctly held that the SAVE modifications were arbitrary and capricious because they violated the change-in-position doctrine. Under that doctrine, “[a]gencies are free to change their existing policies as long as they provide

a reasoned explanation for the change,” “display awareness that [they are] changing position,” and consider “serious reliance interests.” *FDA v. Wages & White Lion Invs.*, 604 U.S. 542, 568 (2025). “An agency may not, for example, depart from a prior policy *sub silentio* or simply disregard rules that are still on the books.” *FCC v. Fox Television Stations, Inc.*, 556 U.S. 502, 515 (2009). The duty to explain and consider reliance interests is particularly important when there have been “decades” of reliance on the prior policy. *See Encino Motorcars, LLC v. Navarro*, 579 U.S. 211, 222 (2016). Review of these actions “is limited to ‘the grounds that the agency invoked when it took the action.’” *DHS v. Regents of the Univ. of Cal. (“Regents”)*, 591 U.S. 1, 20 (2020). *Post hoc* rationalizations are “impermissible.” *Id.* at 21.

The government has conceded that the transformation of SAVE, from a targeted tool to search individuals using DHS-issued identifiers to one allowing bulk searches of every citizen’s SSA data, amounted to a change in position. App.62a.

These changes were implemented in a way that made it impossible for Applicants to meet the APA’s reasoned decision-making requirements. The Privacy Act requires a thirty-day notice-and-comment period “*prior to*” a new routine use of SAVE taking effect, 5 U.S.C. § 552a(e)(11) (emphasis added), but Modified SAVE was effective in May 2025 and no notice was published until October 2025, over a month after the present litigation was filed. *See* DHS-AR-114 (published October 31, 2025); SSA-AR-206 (published November 12, 2025). Even once Applicants published the required notices, they maintained that Modified SAVE was already in effect before publication, would remain in effect through the comment period, and that the notices would be “effective upon publication,” rather than after any period of consideration of public comments. DHS-AR-115. Ultimately, the agencies received over 30,550 comments on the published SORNs. Dkt.66-1 at 8. As the district court correctly found, this untimely comment period meant that Petitioners could not have considered reliance interests before changing their position. App.62a.

The government's heavy emphasis on excusing its procedural missteps, *see* App.27-29, suggests they missed the import of the district court's analysis—that comments received months *after* modified SAVE went into effect, and *after* the government had already committed to making the new SORNs effective, “could not provide a ‘reasoned explanation for the change’ that the Federal Defendants undertook.” App.63a (quoting *Wages & White Lion Invs.*, 604 U.S. at 568). Whatever consideration the agency may have given to issues raised by commenters was inherently *post hoc* and inconsistent with the APA's requirement of reasoned decision-making. *Regents*, 591 U.S. at 21.

The government concedes that it did not consider reliance interests but argues there were none to consider. App.30. This assertion is wrong, and it serves as an independently sufficient reason why the SAVE modifications violated the APA. *See Regents*, 591 U.S. at 30-33 (holding agency action arbitrary and capricious for not considering reliance interests even though the agency thought there were none).

As the district court found, and as evidenced by the over-30,000 comments received by DHS and SSA, there were significant reliance interests. “[P]ersons who had provided information to SSA” and who had “failed to update SSA data” had reliance interests. App.62a-63a. These individuals include naturalized, derived, and acquired U.S. citizens who did not update their citizenship status in SSA records because there is no legal requirement to do so and because SSA records had never before been used to check the citizenship of registered voters. *See supra* Statement § II.C. The change in position meant these individuals were placed at risk of being purged from voter rolls, prevented from voting, referred for criminal prosecution, or denied public benefits. Applicants' admitted failure to consider these reliance interests was arbitrary and capricious.

E. The SAVE Modifications Violated the Privacy Act

APA cause of action. Congress did not immunize agency policies that violate

the Privacy Act from review under the APA. App.45a-49a; *contra* App.23-26. The APA requires federal courts to “hold unlawful and set aside agency action” that is “not in accordance with law.” 5 U.S.C. § 706(2)(A). “Law” here “means, of course, *any* law.” *FCC v. NextWave Personal Commc’ns, Inc.*, 537 U.S. 293, 300 (2003) (emphasis in original). This Court embeds § 706(2)(A)’s mandate in a “strong presumption that Congress intends judicial review of administrative action.” *Bowen v. Mich. Acad. of Fam. Phys.*, 476 U.S. 667, 670 (1986).

While this Court has not conclusively affirmed the availability of APA review for Privacy Act violations, it has twice acknowledged that “injunctive relief under the Administrative Procedure Act (APA)” may be available to “deter[] violations of [the Privacy Act’s] substantive provisions” for which the Act lacks a cause of action. *Cooper*, 566 U.S. at 303 n.12; *see also Doe v. Chao*, 540 U.S. 614, 619 n.1 (2004) (“[T]he general provisions for equitable relief within the Administrative Procedure Act” may explain the “inattention” of the Privacy Act to the “standards of proof governing equitable relief.”).

The government contends that since the Privacy Act creates some remedies for some injuries, it must “impliedly forbid[]” judicial review of all other agency action that violates the Privacy Act. App.24 (quoting 5 U.S.C. § 702). But this sweeping assertion ignores this Court’s admonishment that “Congress rarely allows claims about agency action to escape effective judicial review.” *Axon Enter., Inc. v. Fed. Trade Comm’n*, 598 U.S. 175, 186 (2023). Where Congress restricts judicial review, this Court expects to find “clear and convincing evidence” of a “legislative intent” to do so. *Abbott Labs. v. Gardner*, 387 U.S. 136, 141 (1967).

The Privacy Act’s internal remedial scheme only provides for injunctive relief in two narrow situations: to force an agency to amend an individual’s record, and to force an agency to disclose an individual’s records to them. 5 U.S.C. § 552a(g)(2), (g)(3). But the Privacy Act imposes myriad other requirements on agencies, such as

the Act’s notice and comment requirements, *id.* § 552a(e)(7); and general prohibitions on disclosure of personal records within and outside the government, *id.* § 552a(b), accumulating records monitoring individuals’ exercise of First Amendment rights, *id.* § 552a(e)(7), and creating cross-agency computer programs matching personal information across disparate systems, *id.* § 552a(o).

Congress did not intend to effectively preclude judicial review of violations of those requirements, just because it created the two narrow injunctive remedies codified in § 552a(g). As this Court has noted, a narrow remedial scheme should typically be understood as “exclusive *where it applies*,” but not necessarily to displace “general judicial review” elsewhere. *Axon*, 598 U.S. at 186 (emphasis added). For this Court to conclude otherwise, as Applicants advance, would mean the *only* mechanism for judicial review of programs that systematically violate the Privacy Act is for each of the millions of impacted Americans to litigate claims for monetary damages.

This Court has recognized that the availability of a “naked money judgment” will not “always be an adequate substitute for prospective relief” such that it displaces general judicial review. *Bowen v. Massachusetts*, 487 U.S. 879, 905 (1988). Further, “to demand that every potentially affected party” bring such claims is “impractical—and an enormous waste of resources.” *McLaughlin Chiropractic Assocs., Inc. v. McKesson Corp.*, 606 U.S. 146, 158 (2025) (concerning pre-enforcement challenges to Hobbs Act violations, noting it is “unrealistic” to expect “more than a fraction” of affected people to have the familiarity with the Federal Register needed to bring challenges).

Contemporaneous understanding and subsequent statutory amendments confirm Congress’s intent to maintain APA review for some Privacy Act violations. The Privacy Act required OMB to issue “guidelines and regulations” for the Act’s implementation. 5 U.S.C. § 552a(v). Those guidelines, which were “issued contemporaneously with the” Act and “have remained consistent over time,” *Loper*

Bright, 603 U.S. at 394, “recognized that the Privacy Act’s judicial review provisions would not preclude ‘judicial review under other provisions of the [APA].” App.49a (quoting 40 Fed. Reg. 28948, 28968 (July 9, 1975)). Further, the district court correctly noted that subsequent amendments to the Privacy Act have *expressly* limited judicial review for certain populations not at issue in this case, in exactly the way that the government argues should be *implied* for the Act as a whole. App.49a. “Where Congress includes particular language in one section of a statute but omits it in another section of the same Act, it is generally presumed that Congress acts intentionally and purposely in the disparate inclusion or exclusion.” *City & Cnty. of S.F.*, 604 U.S. at 344.

The text, structure, and contemporaneous and subsequent history of the Privacy Act do not make it likely that the government will supply a “persuasive reason to believe that Congress intended to preclude” injunctive relief for agency actions that violate the Privacy Act’s other requirements. *McLaughlin*, 606 U.S. at 155-56 (cleaned up).

Violations of the Privacy Act’s Disclosure Restrictions. The district court correctly held Modified SAVE violated the Privacy Act’s restrictions on disclosure. *See* App.50a-56a; 5 U.S.C. § 552a(b). The government invokes just one exception to the Act’s general ban on disclosure without consent: the exception for disclosures pursuant to a “routine use.” App.26. That exception requires disclosures to be “both (i) for a purpose which is compatible with the purpose for which it was collected and (ii) within the scope of a routine use notice published by the agency.” App.50a (cleaned up) (quoting *Ames v. DHS*, 861 F.3d 238, 240 (D.C. Cir. 2017)); *see* 5 U.S.C. § 552a(a)(7). The compatibility requirement is not met here because the SSA records disclosed through Modified SAVE were “collected . . . for purposes concerning work authorization and eligibility for SSA benefits,” which does not have “any nexus to state governments’ voter verification efforts.” App.51a, 54a.

Regarding SSA’s disclosure of SSNs, the government adopts far too general a test to determine the “purpose” of that data’s collection—ignoring the limited ways in which SSNs are used when “‘keep[ing] track’ of” and “‘matching’” people. App.26. At Applicants’ high level of abstraction, nearly *any* disclosure of SSA data could be called “routine.” But SSA creates and collects SSNs to keep track of and match future and current *beneficiaries*. The unabridged language from the government’s sole case, *Bowen v. Roy*, 476 U.S. 693, 710-711 (1986), proves this point: this Court observed that SSNs are used “to keep track of *persons no longer entitled to receive food stamps* because of past fraud or abuses of the program,” and for matching “federal employee files against AFDC and Medicaid files to determine instances of Government employees *receiving welfare benefits* improperly.” *Id.* at 710 (emphasis added). SSNs are not collected for any voting-related purpose. Nor is receipt of benefits—which the political branches can extend or withdraw as they see fit, *see Califano v. Aznavorian*, 439 U.S. 170, 174 (1978)—comparable to voting, a “right” that is “fundamental,” *Bush v. Gore*, 531 U.S. 98, 104 (2000). “Under any reasonable formulation of the compatibility test,” *Ames*, 861 F.3d at 240, n.1, the routine-use exception does not apply to disclosure of SSA citizenship data and SSNs through Modified SAVE.

The government also ignores that SSA is not just disclosing SSNs through Modified SAVE; it is also disclosing the *citizenship data* it collects. *See supra* Statement § II.B. Again, SSA does not collect citizenship data for identification purposes; it collects the information “for purposes concerning work authorization and eligibility for SSA benefits.” App.51a. And SSA explicitly warns that its “‘citizenship information is accurate for SSA’s program purposes’ only—‘if used later for other purposes, it may not be current.’” App.51a (quoting SSA-AR-103).

Violations of the Privacy Act’s Procedural Requirements. The district court correctly held that the SAVE modifications violated the Privacy Act’s procedural requirements. *See* App.58a-63a. As explained, agencies must *both* publish

a modified SORN 30 days before beginning a new routine use *and* meaningfully consider public comments received in response. *See supra* Statement § I.B. Applicants violated both requirements by making the SAVE modifications on a timeline that made it impossible to consider public comments before new routine uses went into effect, and then by failing to provide any explanation of “any changes made or not made as a result” of the more than 30,000 “public comment[s]” received. 40 Fed. Reg. at 28966; *see supra* Argument § I.D.

Relying on *Little Sisters of the Poor Saints Peter & Paul Home v. Pennsylvania*, 591 U.S. 657, 685 (2020), the government faults the district court for applying the “open-mindedness test” to the Privacy Act’s notice-and-comment requirements. App.28. Yet the government ignores the court’s exhaustive discussion of why *Little Sisters* “has little relevance here.” App.57a-60a. And the district court made clear its Privacy Act holding would be the same even if the government was “correct and [that] *Little Sisters* abrogated the D.C. Circuit’s use of the open-mindedness test” for purposes of the Privacy Act. App.60a.

II. The Remaining Factors Cut Sharply Against a Stay

Because “the Government has not shown that it is likely to prevail on the various legal arguments advanced in its stay application,” the Court should “start and stop with the first [stay] factor.” *Trump*, 146 S. Ct. at 2246; *accord* App.130a. But the remaining factors also weigh strongly against a stay.

A. Applicants Will Suffer No Irreparable Harm

The government is not irreparably harmed because—as it concedes—it is still able to provide SAVE verifications using the pre-2025 functionality it used for decades. App.34. The court of appeals noted that the government’s “principal operational harm from the denial of a stay” is that, without Modified SAVE, some citizenship and other verifications are, as the government described, “slower and

more cumbersome.” App.130a.¹⁷ While those constraints may require more work, “whatever its limitations, the preexisting SAVE program in operation for decades remains available to the states and to federal programs.” *Id.* Thus, any harm “stems from the unavailability of modified SAVE’s SSN- and bulk-search functionalities, not the loss of SAVE-based verification altogether.” App.130a-131a.

While the government claims “the district court’s order impairs the proper administration of federal elections,” App.34, there is no indication that Modified SAVE will meaningfully serve that interest. Modified SAVE’s unreliable citizenship data would *impair* the proper administration of elections by burdening the voting rights of lawful voters. And the main change made by Modified SAVE is that the system now sweeps in *U.S.-born* citizens, who indisputably have a right to vote.

The government also overstates the impact of the district court’s decision on the upcoming November 2026 election. As the court of appeals noted, App.131a, the National Voter Registration Act (“NVRA”) bars systematic voter-list maintenance within 90 days before a federal election. 52 U.S.C. § 20507(c)(2)(A). In fact, the government *itself* argued, in opposing preliminary relief in the district court, that this 90-day limitation *precluded* use of Modified SAVE for systematic voter-list maintenance. *See* App.131a; Dkt.37 at 35-36. And as the court of appeals noted, “[b]y the time the government sought a stay pending appeal in this court, that limitation was already operative in several states and soon would be in many more,” undercutting any claim of harm. App.131a. Thus, it is “federal law itself—in the form of the NVRA—which constrains the principal election-related use of modified SAVE during the relevant period” and “[d]enying a stay thus does not deprive the government or the states of an otherwise available opportunity to undertake

¹⁷ The court of appeals did not reach the factors of irreparable harm and balance of the equities, finding no likelihood of success on appeal, but noted several persuasive considerations that would inform that inquiry. App.130a-132a.

systematic voter-list maintenance while ordinary appellate review proceeds.” App.130a-131a. And, in any event, *individualized* searches in support of *individualized* voter eligibility determinations can still be run on the pre-2025 SAVE system, which remains available and would not violate the NVRA’s 90-day cut-off for systematic voter removal programs. 52 U.S.C. § 20507(c)(2)(A).

The government’s remaining arguments are equally unpersuasive and unsupported by the record. The government argues that the order causes harm “[b]y preventing DHS from updating its own records with more current citizenship and immigration information held by SSA.” App.36. But SSA has made clear it does *not* maintain “current” citizenship data and “is *not* the custodian of U.S. citizenship records,” SSA-AR-44 (emphasis added), so it cannot be true that it has “more current citizenship and immigration information” than DHS, the agency that administers immigration and citizenship laws. Nor does the cost of maintaining both versions of SAVE establish irreparable harm. As the district court found, this argument is factually unsupported, App.89a n.6, and nothing in its vacatur order *requires* maintenance of Modified SAVE or any parallel systems of records. To the extent that the government is voluntarily making that choice, “[s]uch self-imposed costs are not properly the subject of inquiry on a motion for stay.” *Dep’t of Educ. v. California*, 604 U.S. 650, 652 (2025).

B. The Balance of Equities and Public Interest Favor Denying a Stay

The balance of the equities likewise supports denying the requested stay. *See* App.89a-99a. The public interest is best served by allowing the district court’s judgment to remain in effect, pending the appeal process, because it will protect millions of Americans’ privacy and voting rights. As the district court found and Applicants do not contest, Modified SAVE is riddled with inaccuracies. *See* App.69a, 90a, 111a. And Applicants’ desire to expand the use of Modified SAVE risks

broadening the harms that erroneously flagged American citizens have already experienced. *See* App.32a-35a. With a major federal election 49 days away and many states’ voter registration deadlines fast approaching in the first week of October, erroneously identifying and removing voters based on indication of non-citizenship in stale, unreliable SAVE data would cause substantial harm to the rights of naturalized and derived citizen voters, including Respondents’ members.

Moreover, the privacy interests Applicants dismiss as insufficiently “concrete,” App.16, are precisely the same interests that Congress *already weighed* in passing the Social Security Act and Privacy Act, “recognizing that the statutory protections might lead to decreased government efficiency.” App.90a. Courts should not “reject the balance that Congress has struck” among competing policy concerns. *United States v. Oakland Cannabis Buyers’ Co-op.*, 532 U.S. 483, 497 (2001).

Finally, for all practical purposes, the status quo was altered by the district court on June 22. Modified SAVE has been vacated for nearly three months, and the November general election is already underway. Reinstating Modified SAVE now would needlessly introduce confusion and administrative burdens amid an ongoing election cycle.¹⁸

On balance, the equities strongly favor denial of a stay.

CONCLUSION

The application for a stay should be denied.

¹⁸ Amici wrongly argue that *Purcell v. Gonzalez*, 549 U.S. 1 (2006), counsels in favor of a stay. *See* Br. of Ariz. Sen. Pres. and Speaker of the Ariz. House of Reps. at 3-5, 8-9. *Purcell* dictates that “federal courts ordinarily should not alter *state election laws* in the period close to an election.” *Democratic Nat’l Comm. v. Republican Nat’l Comm.*, 592 U.S. 1039, 1043 (2020) (Kavanaugh, J., concurring) (emphasis added). That principle has no application in this APA suit challenging federal agency action. In any event, *Purcell*’s logic would caution *against* a stay for the reasons stated above.

September 15, 2026

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**Supplemental Appendix of Cited Administrative Record Materials
(Dkt.110)**

DHS-USCIS-004 Systematic Alien Verification for Entitlements (SAVE) Program System of Records, 76 Fed. Reg. 58525, September 21, 2011.....	DHS-AR-0093 – 0097
DHS-USCIS-004 Systematic Alien Verification for Entitlements (SAVE) Program System of Records, 90 Fed. Reg. 48948, October 31, 2025.....	DHS-AR-0114 – 0121
DHS-USCIS-PIA-006(d) Systematic Alien Verification for Entitlements Program Privacy Impact Assessment, October 31, 2025.....	DHS-AR-0221 – 0243
DHS-USCIS-PTA, SAVE Program Optimization Privacy Threshold Analysis (PTA) Final Adjudication, July 17, 2025	DHS-AR-0244 – 0285
DHS-USCIS-PTA, SAVE Program Optimization Privacy Threshold Analysis (PTA) Final Adjudication, September 11, 2025.....	DHS-AR-0286 – 0327
USCIS, DHS and SSA, Info Sharing regarding Citizenship, Signed Agreement USCIS SSA, May 15, 2025	DHS-AR-0420 – 0431
USCIS, DHS, Bulk Case Upload Capability Available for Voter Registration and or Voter List Maintenance GovDelivery email, May 2, 2025	DHS-AR-0449 – 0450
USCIS, DHS, SAVE Federal MOA, June 9, 2025	DHS-AR-0495 – 0504
USCIS, DHS, SAVE MOA, Florida, Flagler County Supervisor of Elections, June 26, 2025	DHS-AR-0759 – 0769
USCIS, DHS, Voter Registration and Voter List Maintenance Fact Sheet, August 27, 2025.....	DHS-AR-1524 – 1527
USCIS, DHS, Voter Registration and Voter List Maintenance Fact Sheet, August 27, 2025	DHS-AR-1528 – 1531

Department of the Treasury, Agreement Between Federal Program Agencies for Intragovernmental Reimbursable Activities, SSA-DHS-USCIS	SSA-AR-0030 – 0049
Agreement Between Federal Program Agencies for Intragovernmental Reimbursable, Buy/Sell Activity	SSA-AR-0089 – 0108
Social Security Administration, Privacy Act of 1974; System of Records, 90 Fed. Reg. 50879 (Nov. 12, 2025) (SORN Publication).....	SSA-AR-0205 – 0211
Non-Public Comment re: SORN Publication.....	SSA-AR-0238 – 0244

below or sign up at the registration desk on the day of the meeting. The names and affiliations, if any, of individuals who address the Committee are included in the public record of the meeting. Please note that the public comment period may end before the time indicated, following the last call for comments. Written comments and requests to have a copy of your materials distributed to each member of the Committee prior to the meeting should be sent to Martha K. Landesberg, Executive Director, DHS Data Privacy and Integrity Advisory Committee, by September 30, 2011. Persons who wish to submit comments and who are not able to attend or speak at the meeting may submit comments at any time. All submissions must include the Docket Number (DHS–2011–0076) and may be submitted by any one of the following methods:

- *Federal eRulemaking Portal:* <http://www.regulations.gov>. Follow the instructions for submitting comments.
- *E-mail:* PrivacyCommittee@dhs.gov. Include the Docket Number (DHS–2011–0076) in the subject line of the message.
- *Fax:* (703) 483–2999.
- *Mail:* Martha K. Landesberg, Executive Director, Data Privacy and Integrity Advisory Committee, Department of Homeland Security, Washington, DC 20528.

Instructions: All submissions must include the words “Department of Homeland Security Data Privacy and Integrity Advisory Committee” and the Docket Number (DHS–2011–0076). Comments received will be posted without alteration at <http://www.regulations.gov>, including any personal information provided.

If you wish to attend the meeting, please plan to arrive at the Navy League Building by 12:45 p.m. The DHS Privacy Office encourages you to register for the meeting in advance by contacting Martha K. Landesberg, Executive Director, DHS Data Privacy and Integrity Advisory Committee, at PrivacyCommittee@dhs.gov. Advance registration is voluntary. The Privacy Act Statement below explains how DHS uses the registration information you may provide and how you may access or correct information retained by DHS, if any.

Docket: For access to the docket to read background documents or comments received by the DHS Data Privacy and Integrity Advisory Committee, go to <http://www.regulations.gov>.

FOR FURTHER INFORMATION CONTACT: Martha K. Landesberg, Executive

Director, DHS Data Privacy and Integrity Advisory Committee, Department of Homeland Security, Washington, DC 20528, by telephone (703) 235–0780, by fax (703) 235–0442, or by e-mail to PrivacyCommittee@dhs.gov.

SUPPLEMENTARY INFORMATION: Notice of this meeting is given under the Federal Advisory Committee Act (FACA), 5 U.S.C. App. 2 The DHS Data Privacy and Integrity Advisory Committee provides advice at the request of the Secretary of Homeland Security and the DHS Chief Privacy Officer on programmatic, policy, operational, administrative, and technological issues within the DHS that relate to personally identifiable information, as well as data integrity and other privacy-related matters. The committee was established by the Secretary of Homeland Security under the authority of 6 U.S.C. 451.

Agenda

During the meeting, the Chief Privacy Officer will provide the Committee an update on the activities of the DHS Privacy Office. The Committee will also receive updates on DHS FOIA operations by the Deputy Chief FOIA Officer and on Advanced Imaging Technology by the Transportation Security Administration’s Privacy Officer. In addition, the Subcommittees will report on their work in support of the Committee’s planned guidance on privacy protections for information sharing within DHS. The agenda will be posted in advance of the meeting on the Committee’s Web site at <http://www.dhs.gov/privacy>. Please note that the meeting may end early if all business is completed.

Privacy Act Statement: DHS’s Use of Your Information

Authority: DHS requests that you voluntarily submit this information under its following authorities: the Federal Records Act, 44 U.S.C. 3101; the FACA, 5 U.S.C. App. 2; and the Privacy Act of 1974, 5 U.S.C. 552a.

Principal Purposes: When you register to attend a DHS Data Privacy and Integrity Advisory Committee meeting, DHS collects your name, contact information, and the organization you represent, if any. We use this information to contact you for purposes related to the meeting, such as to confirm your registration, to advise you of any changes in the meeting, or to assure that we have sufficient materials to distribute to all attendees. We may also use the information you provide for public record purposes such as posting publicly available transcripts and meeting minutes.

Routine Uses and Sharing: In general, DHS will not use the information you provide for any purpose other than the Principal Purposes, and will not share this information within or outside the agency. In certain circumstances, DHS may share this information on a case-by-case basis as required by law or as necessary for a specific purpose, as described in the DHS/ALL–002 Mailing and Other Lists System of Records Notice (November 25, 2008, 73 FR 71659).

Effects of Not Providing Information: You may choose not to provide the requested information or to provide only some of the information DHS requests. If you choose not to provide some or all of the requested information, DHS may not be able to contact you for purposes related to the meeting.

Accessing and Correcting Information: If you are unable to access or correct this information by using the method that you originally used to submit it, you may direct your request in writing to the DHS Deputy Chief FOIA Officer at foia@dhs.gov. Additional instructions are available at <http://www.dhs.gov/foia> and in the DHS/ALL–002 Mailing and Other Lists System of Records referenced above.

Dated: September 9, 2011.

Mary Ellen Callahan,
Chief Privacy Officer, Department of Homeland Security.

[FR Doc. 2011–24223 Filed 9–20–11; 8:45 am]

BILLING CODE 9110–9L–P

DEPARTMENT OF HOMELAND SECURITY

Office of the Secretary

[Docket No. DHS–2011–0071]

Privacy Act of 1974; Department of Homeland Security, U.S. Citizenship and Immigration Services—004 Systematic Alien Verification for Entitlements Program System of Records

AGENCY: Privacy Office, DHS.

ACTION: Notice of revision and republication of Privacy Act System of Records.

SUMMARY: In accordance with the Privacy Act of 1974, the Department of Homeland Security proposes to revise an existing Department of Homeland Security system of records notice titled “DHS/USCIS–004 Verification Information System” system of records and republish it as “DHS/USCIS–004 Systematic Alien Verification for Entitlements Program” system of records. Previously, the Department of

Homeland Security published a single system of records notice for both the E-Verify and Systematic Alien Verification for Entitlements Programs as part of the underlying technology, the Verification Information System on December 11, 2008. On May 11, 2010 the Department of Homeland Security published the Department of Homeland Security/United States Citizenship and Immigration Services—011 E-Verify Program system of records. The Department of Homeland Security now proposes to revise and republish the Department of Homeland Security/United States Citizenship and Immigration Services—004 Verification Information System system of records as the Department of Homeland Security/United States Citizenship and Immigration Services—004 Systematic Alien Verification for Entitlements Program system of records. The United States Citizenship and Immigration Services Verification Division administers the Systematic Alien Verification for Entitlements Program. The Systematic Alien Verification for Entitlements Program is a fee-based intergovernmental initiative designed to help Federal, state, tribal, and local government agencies check immigration status when granting benefits, licenses, and other lawful purposes. On the publication of this SORN, the Verification Information System system of records notice will no longer be applicable. This newly established system will be included in the Department of Homeland Security's inventory of record systems.

DATES: Submit comments on or before October 21, 2011. This new system will be effective October 21, 2011.

ADDRESSES: You may submit comments, identified by docket number DHS–2011–0071 by one of the following methods:

- *Federal e-Rulemaking Portal:* <http://www.regulations.gov>. Follow the instructions for submitting comments.

- *Fax:* 703–483–2999.

- *Mail:* Mary Ellen Callahan, Chief Privacy Officer, Privacy Office, Department of Homeland Security, Washington, DC 20528.

- *Instructions:* All submissions received must include Department of Homeland Security as the agency name and docket number for this rulemaking. All comments received will be posted without change to <http://www.regulations.gov>, including any personal information provided by the submitter.

- *Docket:* For access to the docket to read background documents or

comments received go to <http://www.regulations.gov>.

FOR FURTHER INFORMATION CONTACT: For general questions please contact: Janice Jackson, Acting Privacy Branch, Chief, Verification Division, U.S. Citizenship and Immigration Services, Department of Homeland Security, 131 M Street NE., Suite 200, MS 2600, Washington, DC 20529. For privacy issues please contact: Mary Ellen Callahan (703–235–0780), Chief Privacy Officer, Privacy Office, U.S. Department of Homeland Security, Washington, DC 20528.

SUPPLEMENTARY INFORMATION:

I. Background

Congress mandated that the Immigration and Naturalization Service, as a precursor to the Department of Homeland Security (DHS) United States Citizenship and Immigration Services (USCIS), establish a system to verify the immigration status of individuals seeking government benefits. Authority for having a system for verification of citizenship and immigration status of individuals seeking government benefits can be found in the Immigration Reform and Control Act of 1986 (IRCA), Public Law (Pub. L.) 99–603; the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), Public Law 104–193, 110 Stat. 2168; Title IV, Subtitle A, of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (IIRIRA), Public Law 104–208, 110 Stat. 3009; and the Real ID Act of 2005, Public Law 109–13. Based on these authorities and in accordance with the Privacy Act of 1974, 5 U.S.C. 552a, DHS USCIS proposes to establish a new DHS system of records titled “DHS/USCIS–004 Systematic Alien Verification for Entitlements Program System of Records.”

USCIS Verification Division administers the Systematic Alien Verification for Entitlements (SAVE) Program, a fee-based intergovernmental initiative designed to help Federal, state, tribal, and local government agencies check immigration status when granting benefits, licenses, and other lawful purposes. SAVE is supported by and uses information derived from individuals, partner agencies, the Verification Information System (VIS) and other DHS, Department of State, and Department of Justice systems.

The REAL ID Act of 2005, Public Law 109–13, 119 Stat. 231, 302 (2005) (codified at 49 U.S.C. 30301 note) requires all state Departments of Motor Vehicles (DMV) to utilize the USCIS SAVE program to verify the legal immigration status of applicants for

driver's licenses, driver's permits, and state-issued identification cards.

Congress delayed the initial implementation date from May 2008 until December 2009. DMVs access SAVE through the American Association of Motor Vehicle Administrators Network (AAMVAnet) or via Internet access using Web 3 or Web Services, which is a support service that allows SAVE customer agencies to access VIS information through a software interface.

Previously, USCIS documented the SAVE and E-Verify Programs in the VIS Privacy Impact Assessment (PIA) and System of Records Notice (SORN). VIS was and continues to be the underlying technology of both systems. In order to assist the public in better understanding the two programs, USCIS has issued a separate E-Verify SORN and, with this publication, is updating the original VIS SORN with this updated SORN. SAVE is described in previous SORNs, most recently in the VIS SORN (73 FR 75445, December 11, 2008).

SAVE Usage Overview

The SAVE Program was originally limited to immigration status verification for eligibility determinations of any public benefit, license, or credential—the benefit or “entitlement” referred to in the name of the program. However, over time the scope of SAVE has grown to include the implementation of Section 642(c) of IIRIRA, which obligates USCIS to respond to inquiries “by a federal, state, or local government agency seeking to verify or ascertain the citizenship or immigration status of any individual within the jurisdiction of the agency for any purpose authorized by law.” This expansion was highlighted in previous versions of the SAVE Privacy Impact Assessment (PIA).

Accordingly, to the extent that a Federal, state, or local government entity has the legal authority to verify immigration status, SAVE, as an access method to USCIS systems, is authorized to respond to the request. Specifically, in addition to verifications for purposes of granting government benefits, this includes verification for purposes of background investigations for individuals, and cohabitants of the individuals undergoing background investigations.

Government agencies input biographic information into SAVE for status determinations. If SAVE has a record pertaining to the individual, the government agency automatically receives limited biographic information on the citizenship and immigration status of the individual. If SAVE does

not have a record pertaining to the individual, SAVE prompts the customer agency asking if they would like a manual second step verification, with possible escalation to a manual third step verification, Form G-845, if appropriate. Although SAVE may receive a Social Security Number (SSN) from its supporting VIS systems or customer agencies as part of a status determination, it does not specifically request or return SSNs in its responses.

The primary use of the SAVE information is to provide immigration status information for any legally mandated purpose to Federal, state, and local government customer agencies. The majority of customer agencies use SAVE to determine if applicants are entitled to receive the public benefits, licenses, or credentials that they administer. For example, based on IRCA, customer agencies use SAVE when providing benefits such as education and housing assistance, unemployment benefits, and Medicaid or other state health insurance benefits. PRWORA, through its definition of public benefits, allows customer agencies to use SAVE to determine the immigration status for purposes such as granting licensing and loans. (IIRIRA) provides for customer agencies to use SAVE for any legal purpose, such as credentials, background investigations, and voter registration. In addition, the Real ID Act of 2005 requires that all states utilize SAVE to verify the immigration status of individuals claiming to be non-U.S. citizens for driver's licenses, driver's permits, and identification cards.

Information in SAVE will only be used for SAVE verifications and other purposes incidental to the SAVE process, such as customer agency registration and relationship management, user accountability, program quality management, and monitoring and compliance activities.

In accordance with the Privacy Act of 1974, DHS proposes to establish a new DHS system of records notice titled "DHS/USCIS-004—Systematic Alien Verification for Entitlements Program" system of records. The USCIS Verification Division administers the SAVE Program. SAVE is an intergovernmental initiative designed to assist benefit-granting Federal, state, and local agencies determine if non-U.S. citizen applicants are entitled to receive the public benefits, licenses, or credentials that they administer. Previously, DHS published a single system of records notice for the E-Verify and SAVE Programs as part of the underlying technology, VIS (73 FR 75445, December 11, 2008). DHS is now

publishing separate system of records notices for E-Verify and SAVE in order to assist the public in better understanding these programs. This newly established system of records will be included in DHS's inventory of record systems.

With the publication of this SAVE SORN to accompany the E-Verify SORN (76 FR 26738, May 9, 2011), the VIS SORN will be retired.

II. Privacy Act

The Privacy Act embodies fair information practice principles in a statutory framework governing the means by which the U.S. Government collects, maintains, uses, and disseminates individuals' records. The Privacy Act applies to information that is maintained in a "system of records." A "system of records" is a group of any records under the control of an agency for which information is retrieved by the name of an individual or by some identifying number, symbol, or other identifying particular assigned to the individual. In the Privacy Act, an individual is defined to encompass U.S. citizens and lawful permanent residents. As a matter of policy, DHS extends administrative Privacy Act protections to all individuals where systems of records maintain information on U.S. citizens, lawful permanent residents, and visitors. Below is the description of the DHS/USCIS-004 Systematic Alien Verification for Entitlements Program System of Records.

In accordance with 5 U.S.C. 552a(r), DHS has provided a report of this system of records to the Office of Management and Budget and to Congress.

System of Records: DHS/USCIS-004

SYSTEM NAME:

Department of Homeland Security U.S. Citizenship and Immigration Services—004 Systematic Alien Verification for Entitlements Program System of Records.

SECURITY CLASSIFICATION:

Unclassified, for official use only.

SYSTEM LOCATION:

Records are maintained at USCIS Headquarters in Washington, DC and field offices.

CATEGORIES OF INDIVIDUALS COVERED BY THE SYSTEM:

Categories of individuals covered by this system include both U.S. citizens and non-U.S. citizens covered by provisions of the Immigration and

Nationality Act of the United States, including individuals who have been lawfully admitted to the United States, individuals who have been granted or derived U.S. citizenship, and individuals who have applied for other immigration benefits pursuant to 8 United States Code (U.S.C.) 1103 *et seq.*

SAVE users are covered by the DHS/ALL-004—General Information Technology Access Account Records System SORN (74 FR 49882, last published September 29, 2009).

CATEGORIES OF RECORDS IN THE SYSTEM:

A. Information collected from the benefit applicant by the customer agency to facilitate immigration status verification may include the following about the benefit applicant: receipt number, Alien Number (A-Number), admission number (I-94 number), name (last, first, middle), date of birth, country of birth, customer agency case number, DHS document type, DHS document expiration date, Immigration and Custom Enforcement's (ICE) Student and Exchange Visitor Identification System (SEVIS) ID, foreign passport number, visa number, social security number (in very limited circumstances using the Form G-845, Document Verification Request), and type of benefit(s) for which the applicant has applied (e.g., unemployment insurance, educational assistance, driver licensing, *etc.*).

B. System-generated responses as a result of the SAVE verification process including case verification number and SAVE response.

C. Any information on the individual may be verified through SAVE from the following Federal databases: Arrival/Departure Information System (ADIS), Central Index System (CIS), Computer-Linked Application Information Management System 3 & 4 (CLAIMS 3 & CLAIMS 4), Customer Profile Management System (CPMS), Student and Exchange Visitor Identification System (SEVIS), Customs and Border Protection's (CBP) Nonimmigrant Information System and Border Crossing Information (NIIS and BCI), Enforcement Integrated Database (EID), Enforcement Alien Removal Module (EARM), Enterprise Document Management System (EDMS), Marriage Fraud Amendment System (MFAS), Microfilm Digitization Application System (MiDAS), National File Tracking System (NFTS), Refugees, Asylum, and Parole System (RAPS), Reengineered Naturalization Applications Casework System (RNACS), Image Storage and Retrieval System (ISRS), and immigration status (e.g., Lawful Permanent Resident) from the

Department of Justice Executive Office of Immigration Review (EOIR) System (EOIR) and the Department of State the Consular Consolidated Database (DOS-CCD).

The individual information that may be verified through SAVE includes: A-Number, name (last, first, middle), date of birth, date entered into the United States (entry date), country of birth, class of admission code, file control office code, SSN, I-94 number, provision of law code cited for employment authorization, alien's status change date, date admitted until, country of citizenship, port of entry, departure date, visa number, passport number, passport information, passport card number, document receipt number, form numbers (e.g., Form I-551 Lawful Permanent Resident Card or Form I-766 Employment Authorization Document), SEVIS Identification Number (SEVIS ID), naturalization date, Federal Bureau of Investigation Number (FIN), beneficiary alien number, beneficiary date of birth, beneficiary country of birth, beneficiary SSN, beneficiary last name, beneficiary first name, beneficiary middle name, petitioner alien number, petitioner SSN, petitioner naturalization certificate number, petitioner first name, petitioner last name, petitioner firm name, and petitioner tax number. This information may also include spouse's name (last first, middle), date of birth, country of birth, country of citizenship, class of admission, date of admission, A-Number, receipt number, phone number, marriage date and place, and naturalization date and place; child's name(s) (last, first, middle), date of birth, country of birth, class of admission, A-Number; and employer information: Name, address, supervisor's name, and supervisor's phone number, case history, alerts, case summary comments, case category, date of encounter, encounter information, custody actions and decisions, case actions and decisions, bonds, and photograph, asylum applicant receipt date, airline and flight number, country of residence, city where boarded, city where visa was issued, date visa issued, address while in the United States, nationality, decision memoranda, investigatory reports and materials compiled for the purpose of enforcing immigration laws, exhibits, transcripts, and other case-related papers concerning aliens, alleged aliens, or lawful permanent residents brought into the administrative adjudication process.

AUTHORITY FOR MAINTENANCE OF THE SYSTEM:

Authority for having a system for verification of immigration status is

found in IRCA, Public Law 99-603, 100 Stat. 3359; PRWORA, Public Law 104-193, 110 Stat. 2105; Title IV, Subtitle A, of IIRIRA, Public Law 104-208, 110 Stat. 3009; and the REAL ID Act of 2005, Public Law 109-13, 119 Stat. 231.

PURPOSE(S):

The purpose of the SAVE Program is to provide a fee-based intergovernmental service, which assists Federal, state, Tribal, or local government agencies, or contractors acting on the agency's behalf and licensing bureaus confirm immigration status information, to the extent that such disclosure is necessary to enable these agencies to make decisions related to: (1) Determining of eligibility for a Federal, state, 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.

ROUTINE USES OF RECORDS MAINTAINED IN THE SYSTEM, INCLUDING CATEGORIES OF USERS AND THE PURPOSES OF SUCH USES:

In addition to those disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act, all or a portion of the records or information contained in this system may be disclosed outside DHS as a routine use pursuant to 5 U.S.C. 552a(b)(3) as follows:

A. To the Department of Justice (DOJ), including U.S. Attorney Offices, or other Federal agencies conducting litigation or in proceedings before any court, adjudicative or administrative body, when it is necessary to the litigation and one of the following is a party to the litigation or has an interest in such litigation:

1. DHS or any component thereof;
2. Any employee of DHS in his/her official capacity;
3. Any employee of DHS in his/her individual capacity where DOJ or DHS has agreed to represent the employee; or
4. The U.S. or any agency thereof, is a party to the litigation or has an interest in such litigation, and DHS determines that the records are both relevant and necessary to the litigation and the use of such records is compatible with the purpose for which DHS collected the records.

B. To a congressional office from the record of an individual in response to an inquiry from that congressional office made at the request of the individual to whom the record pertains.

C. To the National Archives and Records Administration (NARA) or other Federal government agencies pursuant to records management inspections being conducted under the authority of 44 U.S.C. 2904 and 2906.

D. To an agency, organization, or individual for the purpose of performing audit or oversight operations as authorized by law, but only such information as is necessary and relevant to such audit or oversight function.

E. To appropriate agencies, entities, and persons when:

1. DHS suspects or has confirmed that the security or confidentiality of information in the system of records has been compromised;

2. DHS has determined that as a result of the suspected or confirmed compromise there is a risk of harm to economic or property interests, identity theft or fraud, or harm to the security or integrity of this system or other systems or programs (whether maintained by DHS or another agency or entity) or harm to the individual that rely upon the compromised information; and

3. The disclosure made to such agencies, entities, and persons is reasonably necessary to assist in connection with DHS's efforts to respond to the suspected or confirmed compromise and prevent, minimize, or remedy such harm.

F. To contractors and their agents, grantees, experts, consultants, and others performing or working on a contract, service, grant, cooperative agreement, or other assignment for DHS, when necessary to accomplish an agency function related to this system of records. Individuals provided information under this routine use are subject to the same Privacy Act requirements and limitations on disclosure as are applicable to DHS officers and employees.

G. To an appropriate Federal, state, Tribal, local, international, or foreign law enforcement agency or other appropriate authority charged with investigating or prosecuting a violation or enforcing or implementing a law, rule, regulation, or order, where a record, either on its face or in conjunction with other information, indicates a violation or potential violation of law, which includes criminal, civil, or regulatory violations and such disclosure is proper and consistent with the official duties of the person making the disclosure.

H. To approved Federal, state, and local government agencies for any legally mandated purpose in accordance with their authorizing statute or law and where an approved Memorandum of Agreement (MOA) or Computer Matching Agreement (CMA) is in place between DHS and the entity.

DISCLOSURE TO CONSUMER REPORTING AGENCIES:

None.

POLICIES AND PRACTICES FOR STORING, RETRIEVING, ACCESSING, RETAINING, AND DISPOSING OF RECORDS IN THE SYSTEM:**STORAGE:**

Records in this system are stored electronically or on paper in secure facilities in a locked drawer behind a locked door. The records are stored on magnetic disc, tape, digital media, and CD-ROM.

RETRIEVABILITY:

Records may be retrieved by name of applicant or other unique identifier to include: Verification number, A-Number, I-94 number, SSN, Passport number, Visa number, SEVIS ID, or by the submitting agency name.

SAFEGUARDS:

Records in this system are safeguarded in accordance with applicable rules and policies, including all applicable DHS automated systems security and access policies. Strict controls have been imposed to minimize the risk of compromising the information that is being stored. Access to the computer system containing the records in this system is limited to those individuals who have a need to know the information for the performance of their official duties and who have appropriate clearances or permissions.

RETENTION AND DISPOSAL:

The retention and disposal schedule, N1-566-08-7, has been approved by the National Archives and Records Administration. Records collected in the process of enrolling in SAVE and in verifying citizenship or immigration status are stored and retained in SAVE for ten (10) years from the date of the completion of verification, unless the records are part of an on-going investigation in which case they be retained until completion of the investigation. This period is based on the statute of limitations for most types of misuse or fraud possibly using SAVE (under 18 U.S.C. 3291, the statute of limitations for false statements or misuse regarding passports, citizenship, or naturalization documents).

SYSTEM MANAGER AND ADDRESS:

Chief, Verification Division, U.S. Citizenship and Immigration Services, 131 M Street NE., Suite 200, MS 2600, Washington, DC 20529.

NOTIFICATION PROCEDURE:

Individuals seeking notification of and access to any record contained in this system of records, or seeking to contest its content, may submit a request in writing to the USCIS's FOIA Officer whose contact information can be found at <http://www.dhs.gov/foia> under "contacts." If an individual

believes more than one component maintains Privacy Act records concerning him or her the individual may submit the request to the Chief Privacy Officer and Chief Freedom of Information Act Officer, Department of Homeland Security, 245 Murray Drive, SW., STOP-0655, Washington, DC 20528.

When seeking records about yourself from this system of records or any other Departmental system of records your request must conform with the Privacy Act regulations set forth in 6 CFR part 5. You must first verify your identity, meaning that you must provide your full name, current address and date and place of birth. You must sign your request, and your signature must either be notarized or submitted under 28 U.S.C. 1746, a law that permits statements to be made under penalty of perjury as a substitute for notarization. While no specific form is required, you may obtain forms for this purpose from the Chief Privacy Officer and Chief Freedom of Information Act Officer, <http://www.dhs.gov> or 1-866-431-0486. In addition you should provide the following:

- An explanation of why you believe the Department would have information on you;
- Identify which component(s) of the Department you believe may have the information about you;
- Specify when you believe the records would have been created;
- Provide any other information that will help the FOIA staff determine which DHS component agency may have responsive records; and
- If your request is seeking records pertaining to another living individual, you must include a statement from that individual certifying his/her agreement for you to access his/her records.

Without this bulleted information the component(s) may not be able to conduct an effective search, and your request may be denied due to lack of specificity or lack of compliance with applicable regulations.

RECORD ACCESS PROCEDURES:

See "Notification procedure" above.

CONTESTING RECORD PROCEDURES:

See "Notification procedure" above.

RECORD SOURCE CATEGORIES:

Records are obtained from several sources to include: (A) Agencies seeking to determine immigration status; (B) individuals seeking public licenses, benefits, or credentials; (C) information collected from the Federal databases listed in the Category of Records section above; and (D) information created by SAVE.

EXEMPTIONS CLAIMED FOR THE SYSTEM:

None.

Dated: August 26, 2011.

Mary Ellen Callahan,

Chief Privacy Officer, Department of Homeland Security.

[FR Doc. 2011-24221 Filed 9-20-11; 8:45 am]

BILLING CODE 9111-97-P

DEPARTMENT OF HOMELAND SECURITY**Coast Guard**

[USCG-2011-0869]

Information Collection Requests to Office of Management and Budget

AGENCY: Coast Guard, DHS.

ACTION: Sixty-day notice requesting comments.

SUMMARY: In compliance with the Paperwork Reduction Act of 1995, the U.S. Coast Guard intends to submit Information Collection Requests (ICRs) to the Office of Management and Budget (OMB), Office of Information and Regulatory Affairs (OIRA), requesting approval of revisions to the following collections of information: 1625-0067, Claims under the Oil Pollution Act of 1990; and 1625-0068, State Access to the Oil Spill Liability Trust Fund for Removal costs under the Oil Pollution Act of 1990. Our ICRs describe the information we seek to collect from the public. Before submitting these ICRs to OIRA, the Coast Guard is inviting comments as described below.

DATES: Comments must reach the Coast Guard on or before November 21, 2011.

ADDRESSES: You may submit comments identified by Coast Guard docket number [USCG-2011-0869] to the Docket Management Facility (DMF) at the U.S. Department of Transportation (DOT). To avoid duplicate submissions, please use only one of the following means:

(1) *Online:* <http://www.regulations.gov>.

(2) *Mail:* DMF (M-30), DOT, West Building Ground Floor, Room W12-140, 1200 New Jersey Avenue, SE., Washington, DC 20590-0001.

(3) *Hand delivery:* Same as mail address above, between 9 a.m. and 5 p.m., Monday through Friday, except Federal holidays. The telephone number is 202-366-9329.

(4) *Fax:* 202-493-2251. To ensure your comments are received in a timely manner, mark the fax, to attention Desk Officer for the Coast Guard.

Protection Agency, 109 TW Alexander Drive, RTP, NC 27711; telephone number: (919) 541-3649; email address: hoyoux.marc@epa.gov.

SUPPLEMENTARY INFORMATION: This is a proposed extension of the ICR, which is currently approved through October 31, 2025. An agency may not conduct or sponsor and a person is not required to respond to a collection of information unless it displays a currently valid OMB control number.

Public comments were previously requested via the **Federal Register** on June 5, 2025, during a 60-day comment period (90 FR 23932). This notice allows for an additional 30 days for public comments. Supporting documents, which explain in detail the information that the EPA will be collecting, are available in the public docket for this ICR. The supporting documents include a response to comments document that compiles and responds to comments received in the first notice. The docket can be viewed online at www.regulations.gov or in person at the EPA Docket Center, WJC West, Room 3334, 1301 Constitution Ave. NW, Washington, DC. The telephone number for the Docket Center is 202-566-1744. For additional information about EPA's public docket, visit <http://www.epa.gov/dockets>.

Abstract: The EPA promulgated the Air Emissions Reporting Requirements (AERR) (40 CFR part 51, subpart A) to coordinate emissions inventory reporting requirements. Under this reporting, 54 State and territorial air quality agencies, including the District of Columbia, as well as an estimated 9 local air quality agencies, must submit emissions data every 3 years for all point sources and some non-point, on-road mobile, and non-road mobile sources of volatile organic compounds, oxides of nitrogen, carbon monoxide, sulfur dioxide, particulate matter less than or equal to 10 micrometers in diameter, particulate matter less than or equal to 2.5 micrometers in diameter, ammonia, and lead. In addition, the air quality agencies must submit annual emission data for point sources for a subset of point sources every year. An estimated 5 Tribal air agencies voluntarily submit point and nonpoint sources in triennial years.

The data collected from the emission reporting is necessary to compile and make publicly available a national inventory of air pollutant emissions. The information collected supports both EPA's implementation of the CAA, and State/Local/Tribal air agencies in fulfilling their requirements under CAA sections 110(a), 172, 182, 187, and 189

to implement primary and secondary national ambient air quality standards (NAAQS). A comprehensive inventory updated at regular intervals is essential to allow the EPA to fulfill its mandate to monitor and plan for the attainment and maintenance of the NAAQS established for criteria pollutants in the CAA.

Form Numbers: None.

Respondents/affected entities: Entities potentially affected by this collection request are generally State, territorial, and local government air quality managements programs. Tribal governments are not affected unless they have sought and obtained "Treatment as a State" (TAS) status under the Tribal Authority Rule and, on that basis, are authorized to implement and enforce the AERR rule. For the most recent 2023 triennial inventory, no Tribes have TAS for emissions inventory reporting, and 2 Tribal agencies voluntarily reported to the NEI.

Additionally, State and local agencies collect data from owners/operators to be able to provide it to the EPA. The EPA seeks information from State and local air agencies to indicate the degree to which emissions data collection is due to the AERR rather than something that these agencies would impose even in the absence of the AERR.

Respondent's obligation to respond: This information is collected under 23 U.S.C. 101; 42 U.S.C. 7401-7671q, and the authority of the AERR. This information is mandatory and, as specified, cannot be treated as confidential by the EPA.

Estimated number of respondents: 68 (total including voluntarily reporting) State, local and Tribal agencies and 12,379 owners/operators reporting to State and local agencies.

Frequency of response: Annual.

Total estimated burden: 53,482 hours (per year) including 7,865 voluntary hours (per year) for State, local, and Tribal air agencies and 145,077 hours (per year) for owners/operators including 84 voluntary hours (per year). Burden is defined at 5 CFR 1320.03(b).

Total estimated cost: \$19,854,038 (per year) for State, local, and Tribal air agencies, which includes \$712,432 for voluntary activities and \$15,130,399 annualized capital or operation and maintenance costs. \$16,578,243 (per year) for owners/operators.

Changes in the estimates: There is an increase of 4,780 hours in the total estimated respondent burden for State, local, and Tribal air agencies and an increase of 145,077 hours for owners/operators compared with the ICR currently approved by OMB. This increase for State, local, and Tribal air

agencies is due to improvements in the way the EPA estimates the burden. The increase for owners/operators is due to including the burden on owners/operators for the first time in the approach.

Courtney Kerwin,

Director, Information Engagement Division.

[FR Doc. 2025-19733 Filed 10-30-25; 8:45 am]

BILLING CODE 6560-50-P

DEPARTMENT OF HOMELAND SECURITY

[Docket No. USCIS-2025-0337]

Privacy Act of 1974; System of Records

AGENCY: U.S. Department of Homeland Security, U.S. Citizenship and Immigration Services.

ACTION: Notice of a modified system of records.

SUMMARY: In accordance with the Privacy Act of 1974, the Department of Homeland Security (DHS) proposes to modify and reissue a DHS system of records notice (SORN) titled, "Department of Homeland Security/U.S. Citizenship and Immigration Services (USCIS)-004 Systematic Alien Verification for Entitlements Program (SAVE)." As described in this modified SORN, USCIS, an agency within DHS, collects and maintains records on applicants for public benefits, licenses, grants, governmental credentials, and other statutorily authorized purposes through the SAVE program. SAVE allows registered user agencies to verify the immigration status/category ("immigration status") and U.S. citizenship (including for U.S. citizens by birth, naturalized and certain acquired citizens) of individuals applying for or receiving a public benefit, license or other authorized purpose ("benefit"). "Acquired citizenship" refers to U.S. citizenship conveyed to children through the naturalization of parents or, under certain circumstances, at birth to foreign-born children of U.S. citizens, provided certain conditions are met. DHS/USCIS is updating this SORN to include updates and modifications to the (1) purpose(s) of the system, (2) categories of individuals covered by the system, (3) categories of records in the system, (4) records source categories, and (5) routine uses of records maintained in the system. Additionally, this notice includes non-substantive changes to simplify the formatting and text of the previously published notice.

This modified system will be included in DHS's inventory of record systems.

DATES: Submit comments on or before December 1, 2025. This modified system will be effective upon publication. New or modified routine uses will be effective December 1, 2025.

ADDRESSES: You may submit comments, identified by docket number USCIS–2025–0337 by one of the following methods:

- *Federal e-Rulemaking Portal:* <http://www.regulations.gov>. Follow the instructions for submitting comments.

- *Fax:* 202–343–4010.

- *Mail:* Roman Jankowski, Chief Privacy Officer, Privacy Office, Department of Homeland Security, Washington, DC 20528–0655.

Instructions: All submissions received must include the agency name and docket number USCIS–2025–0337. All comments received will be posted without change to <http://www.regulations.gov>, including any personal information provided.

Docket: For access to the docket to read background documents or comments received, go to <http://www.regulations.gov>.

FOR FURTHER INFORMATION CONTACT: For general questions, please contact: Angela Y. Washington, 240–721–3705, Privacy Officer, U.S. Citizenship and Immigration Services, USCIS Headquarters, 5900 Capital Gateway Dr., Camp Springs, MD 20746. For privacy questions, please contact: Roman Jankowski, (202) 343–1717, Chief Privacy Officer, Privacy Office, Department of Homeland Security, Washington, DC 20528–0655.

SUPPLEMENTARY INFORMATION:

I. Background

In accordance with the Privacy Act of 1974, 5 U.S.C. 552a, the Department of Homeland Security (DHS), U.S. Citizenship and Immigration Services (USCIS) is proposing to modify and reissue a current DHS SORN titled, “DHS/USCIS–004 Systematic Alien Verification for Entitlements Program System of Records.”

This modified SORN is being published to update the purpose of SAVE to include the addition of expanded search functionality for registered SAVE user agencies to verify the U.S. citizenship of U.S. citizens by birth and to clarify use of SAVE for voter verification.

This SORN modification also clarifies and informs the public that SAVE has removed transaction charges for all state, local, tribal, and territorial government agencies that use the

system. Federal agencies are still charged a fee to use SAVE.

DHS/USCIS is adding individuals that are U.S. citizens by birth to the categories of individuals covered by the system.

DHS/USCIS is updating the categories of records in the system to include collecting both full and truncated (last four digits) Social Security number (other than those collected on Form G–845, Verification Request), U.S. passport number, driver's license number, and information from the Social Security Administration.

DHS/USCIS is revising the record source categories to add SSA–60–0058 Master Files of Social Security Number Holders, Social Security Number Applications, February 20, 2025 (90 FR 10025) and state or other national agencies that issue or maintain driver's license information.

DHS/USCIS is amending the routine uses section of the SORN to include adding Routine Use L, to support sharing with Social Security Administration and other federal organizations, and Routine Use M, to support sharing with federal agencies (e.g., the Department of Health and Human Services) to support auditing of federal programs administered by state, local, and tribal governments (e.g., Medicaid).

Additionally, this notice includes non-substantive changes, including reorganizing of categories of records, change in the use of terms such as from “derived” citizen/citizenship to “acquired” citizen/citizenship, and spelling out of form names from the previously published system of records notice.

Consistent with DHS's information sharing mission, information stored in DHS/USCIS SAVE may be shared with other DHS Components that have a need to know of the information to carry out their national security, law enforcement, immigration, intelligence, or other homeland security functions. In addition, DHS/USCIS may share information with appropriate federal, state, local, tribal, territorial, foreign, or international government agencies consistent with the routine uses set forth in this system of records notice. Information in SAVE, including records submitted by the user agency, is not to be used for administrative (non-criminal) immigration enforcement purposes. *See* Immigration Reform and Control Act (IRCA), Public Law 99–603, Part C, Section 121(c)(1) (Nov. 6, 1986).

This modified system will be included in DHS's inventory of record systems. USCIS administers SAVE. SAVE is an online intergovernmental

service designed to help federal, state, territorial, tribal, local government agencies, benefit-granting agencies, other authorized entities (e.g., Airport Operators under the Federal Aviation Administration (FAA) Extension, Safety and Security Act of 2016), and licensing bureaus, as authorized by law (collectively, “SAVE user agencies”), determine the U.S. citizenship and immigration status of individuals within their jurisdiction for the purpose of granting benefits, licenses, and other lawful purposes. Uses of SAVE may include verification of immigration status or category and U.S. citizenship, including U.S. citizens by birth as well as naturalized and certain acquired citizens, when issuing benefits such as Social Security numbers, public health care, Supplemental Nutrition Assistance Program payments, Temporary Assistance for Needy Families, Medicaid, Children's Health Insurance Program; conducting background investigations, armed forces recruitment, REAL ID compliance; or any other purpose authorized by law, including verification of registrants and registered voters in voter registration and voter list maintenance processes. Prior to accessing SAVE, an agency must register as a user and enter into a Memorandum of Agreement with DHS/USCIS. The prospective user provides the legal authorities requiring or permitting verification of immigration status or U.S. citizenship as part of issuing a benefit. SAVE does not determine a benefit applicant's eligibility for a specific benefit. Only the user agency makes that determination.

A typical SAVE verification involves a registered federal, state, territorial, tribal, or local government benefit or license-granting agency verifying the immigration status or U.S. citizenship of a benefit applicant. SAVE is not a database for immigration status and citizenship information. Rather, SAVE accesses the USCIS Verification Data Integration Service which searches multiple government databases or systems to provide a SAVE response. The initial SAVE response is derived from information contained in government systems accessed by SAVE using information from U.S. government-issued documents, such as a Social Security card, Permanent Resident Card (often referred to as a Green Card) or an Employment Authorization Document. For a SAVE user agency to create a SAVE case, the agency must collect and enter certain identifiers from the benefit applicant's identity document(s). The verification process is driven by identifiers generally

located on immigration documents (e.g., Alien Registration Number (Alien Number or A-Number)/USCIS Number, Card Number/I-797 Receipt Number, or Citizenship/Naturalization Certificate Number) or other government-issued documents (e.g., a Social Security number). The identifier presented by the individual determines the verification process.

SAVE user agencies input data elements pertaining to the applicant through SAVE. SAVE then connects to the internal USCIS Verification Data Integration Service to process the request using the user agency provided data. These data elements may include last name, first name, middle name, date of birth, Social Security number, passport number, driver's license number, one or more DHS immigration enumerators (e.g., Alien Registration Number/USCIS Number, Arrival-Departure Record I-94 Number, Student and Exchange Visitor Information System Identification Number, Certificate of Naturalization Number, Certificate of Citizenship Number, or Unexpired Foreign Passport Number), and other information from immigration documentation (e.g., country of birth, date of entry, or employment authorization category). If the USCIS Verification Data Integration Service locates a corresponding record, it will convey a response to SAVE, and SAVE will send a SAVE case response that includes the data elements used to create the case. It may add one or more additional data elements such as a verification case number, U.S. citizenship or immigration data (e.g., U.S. citizenship, immigration status or category, immigration class of admission and/or employment authorization.), grant date, and sponsorship data. SAVE's responses are based upon the user agency's authority to use SAVE and the type of benefit administered by the user agency.

If SAVE is unable to provide an initial automated response verifying the benefit applicant's immigration status or U.S. citizenship, SAVE will provide instructions on actions the user agency may take, including requesting additional verification. Users may also request additional verification when they have questions about a SAVE response or when requested by the benefit applicant. SAVE additional verification procedures generally entail in-depth electronic and manual research in available records (including both electronic records as well as paper Alien Files (A-Files), when necessary) by USCIS status verification staff to verify the benefit applicant's immigration status or U.S. citizenship.

On January 20, 2025, and March 25, 2025, respectively, the President issued Executive Orders 14159, *Protecting the American People Against Invasion* and 14248, *Preserving and Protecting the Integrity of American Elections*. Executive Order 14159 requires the Secretary to "promptly issue guidance to ensure maximum compliance by [DHS] personnel with the provisions of 8 U.S.C. 1373 and 8 U.S.C. 1644 and ensure that state and local governments are provided with the information necessary to fulfill law enforcement, U.S. citizenship, or immigration status verification requirements authorized by law." Executive Order 14248 provides:

. . . Federal laws, such as the National Voter Registration Act (Pub. L. 103–31) and the Help America Vote Act (Pub. L. 107–252), require States to maintain an accurate and current Statewide list of every legally registered voter in the State. And the Department of Homeland Security is required to share database information with States upon request so they can fulfill this duty. See 8 U.S.C. 1373(c).

Executive Order 14159 directs the Secretary to "ensure that state and local officials have, without the requirement of the payment of a fee, access to appropriate systems for verifying the citizenship or immigration status of individuals registering to vote or who are already registered."

Pursuant to these Executive Orders, DHS personnel must timely provide verification of U.S. citizenship and immigration status information in response to inquiries from federal, state, and local government agencies to verify or ascertain the U.S. citizenship or immigration status of individuals within the jurisdiction of the State or local government agency for any purpose authorized by law. DHS personnel will comply with these requirements, to the maximum extent possible and permissible under law, considering federal statutory requirements, including the Privacy Act of 1974, 5 U.S.C. 552a and 8 U.S.C. 1367 (special protected class information); as well as other applicable laws, rules, regulations, policies, and requirements regarding verification, information sharing, and confidentiality.

To respond to these requirements, USCIS has incorporated a feature to allow SAVE user agencies to create a SAVE case using a full or partial Social Security number and other government-issued enumerators (e.g., passport number; driver's license number). This allows SAVE user agencies to utilize enumerators that are often more readily available and to verify U.S. citizenship

for individuals who do not have an immigration enumerator.

1. Enumerators and Source Systems

a. Social Security Number (Social Security Administration Enumeration System)

When creating a case in SAVE, the user agency must always enter the individual's first and last name, date of birth, and at least one enumerator, which may now include a full 9-digit or partial Social Security number. The ability to create a SAVE case using a full or partial Social Security number is initially limited to users who log into SAVE via a web browser but will eventually be expanded to user agencies who use a system-to-system connection with SAVE via web services.

Where a user uses a full or partial Social Security number to create a SAVE case, USCIS now provides this information to the Social Security Administration Enumeration System for search and response. The Social Security Administration provides the following responses to USCIS:

- Social Security number match (True/False);
- Name match (True/False);
- Date of birth match (True/False);
- Citizenship indicator;
 - "A"—U.S. Citizen;
 - "B"—Legal alien, eligible to work;
 - "C"—Legal alien, not eligible to work;
 - "D"—Other;
 - "E"—Alien Student—restricted work authorized; and
 - "F"—Conditionally legalized alien.
- Foreign born indicator (Citizenship code is not present, but individual was foreign born);
 - State/Country code;
 - American Samoa indicator (True/False);
 - Alien Registration Number (Alien Number or A-Number) (where applicable);
 - Death indicator (Yes/No); and
 - Error code descriptions (transaction and record levels).

This search functionality allows SAVE the capability to verify the Social Security number and U.S. citizen indicators of many U.S. citizens by birth, as found in the Enumeration System. This is an expansion from the previous SAVE functionality, which limited U.S. citizenship verification to DHS records of naturalized and certain acquired U.S. citizens.

b. U.S. Passport Number (Department of State)

SAVE has added the ability for user agencies to verify acquired citizenship

for individuals using a search by name, date of birth, and passport number. USCIS will compare this information against information available in DHS-accessed systems to provide a match or no match response. Prior to having access to passport records, SAVE could only verify acquired U.S. citizens if the individual applied for and received a Certificate of Citizenship from USCIS or if the U.S. Department of State provided USCIS with a record of the passport citizenship adjudication and, if applicable, USCIS will update the individual's record.

c. Driver's License Number (State Records)

Driver's licenses are the most widely used form of identification. By working with state driver's licensing agencies and national agencies that store driver's license information for legal purposes (such as the National Law Enforcement Telecommunications System (NLETS)), SAVE will use driver's license and state identification card numbers to check and confirm identity information. When the agency provides a driver's license or state identification card number as the enumerator to verify the identity of the applicant, SAVE will use state driver's licensing agencies or another source (such as NLETS) to validate the information and gain access to other government enumerators. This will allow SAVE to match against other sources to verify immigration status and U.S. citizenship, which will improve accuracy and efficiency for SAVE user agencies. It must be noted that the Driver's license number search functionality is not live at the time of publication but will be in the foreseeable future.

2. List Processor Feature

User agencies now have the capability to create cases in SAVE by uploading a file with a list of multiple cases. This provides greater efficiency, because the user agency no longer has to enter cases into SAVE one at a time. Initially, only users who log into SAVE using a web browser will have access to this feature, but USCIS may extend this feature to other users in the future.

After file upload and acceptance of the data, SAVE, through an automated process, creates front-end single-record cases for each entry; this is not batch processing but SAVE creating each case individually for the user agency. Initially, the creation of cases using this feature is limited to cases created using an Alien Registration Number, Citizenship or Naturalization Certificate number, or Social Security number. Agencies are not prompted to institute

additional verification when using this process but are instructed to resubmit with additional information when the process is unable to return a response. Expansion of this feature in the future may include the ability to create cases with additional enumerators and the ability to request configured information not automatically selected for the benefit type.

User agencies can access each case created using the list processor feature in SAVE as normal, by viewing the individual case status and response. SAVE also has a feature available to all user agencies to generate a report that will list all the cases created, the status of an individual case, and the SAVE response. Access to generate the report, including what cases are included, vary depending upon the user's permissions. USCIS provides this verification service for all benefit requests.

3. Auditing Verification Records To Support Oversight Organizations

SAVE will support organizations that have entered into required agreements with USCIS and have legal oversight authority over a program or benefit type supported by SAVE through reporting capabilities for auditing purposes. User agencies with a legal authority to monitor and audit benefits granted or voter registration records may view relevant case data such as biographic data, enumerators, case submission date/time, and SAVE response information. Reporting options exist for individual user agencies and their case data.

Additionally, user agencies with appropriate legal authority may now view, within SAVE, other user agencies' case data through a linking mechanism based on either benefit type granted (e.g., Medicare) or by state. This new account type will have reporting options to view case data.

Other account types enable user agencies to create cases within SAVE to verify applicants' current eligibility for benefits previously granted. This will allow organizations, such as federal and state oversight agencies, to ensure user agencies that they legally monitor, and audit are properly verifying immigration status or citizenship status before making an eligibility determination and to ensure previously approved applicants remain eligible for the benefits they are receiving.

4. Voter Registration and Voter List Maintenance

Through this SORN, DHS/USCIS is administratively clarifying the purpose of this system of records by reinserting voter registration that was previously

published in 76 FR 58525 (September 21, 2011) and updating to the term "voter verification" to include verification of U.S. citizens by birth through Social Security number matching. Also, DHS/USCIS is expanding the purpose to include the additional search functionality to verify the citizenship of U.S. citizens by birth for all registered benefits and licenses by registered SAVE user agencies.

II. Privacy Act

The Privacy Act embodies fair information practice principles in a statutory framework governing the means by which Federal Government agencies collect, maintain, use, and disseminate individuals' records. The Privacy Act applies to information that is maintained in a "system of records." A "system of records" is a group of any records under the control of an agency from which information is retrieved by the name of an individual or by some identifying number, symbol, or other identifying particular assigned to the individual. In the Privacy Act, an individual is defined to encompass U.S. citizens and lawful permanent residents. Additionally, and similarly, the Judicial Redress Act provides covered persons with a statutory right to make requests for access and amendment to covered records, as defined by the Judicial Redress Act, along with judicial review for denials of such requests. In addition, the Judicial Redress Act prohibits disclosures of covered records, except as otherwise permitted by the Privacy Act.

Below is the description of the DHS/USCIS-004 SAVE Program System of Records. In accordance with 5 U.S.C. 552a(r), DHS has provided a report of this system of records to the Office of Management and Budget and to Congress.

SYSTEM NAME AND NUMBER:

Department of Homeland Security (DHS)/U.S. Citizenship and Immigration Services (USCIS)-004 Systematic Alien Verification for Entitlements Program System of Records.

SECURITY CLASSIFICATION:

Unclassified

SYSTEM LOCATION:

Records are maintained at the USCIS Headquarters in Camp Springs, MD and at DHS/USCIS field offices. Electronic records for Verification Data Integration Service are stored in a secure, cloud hosted environment.

SYSTEM MANAGER(S):

Chief, Verification Division,
SAVE.help@uscis.dhs.gov, U.S.

Citizenship and Immigration Services, Department of Homeland Security, 5900 Capital Gateway Drive, Mail Stop 2620, Camp Springs, MD 20588–0009.

AUTHORITY FOR MAINTENANCE OF THE SYSTEM:

Authority for having a system for verification of citizenship and immigration status is found in Immigration and Nationality Act, Public Law 82–414, 66 Stat. 163 (June 27, 1952), as amended, Immigration Reform and Control Act, Public Law 99–603, 100 Stat. 3359 (Nov. 6, 1986); Personal Responsibility and Work Opportunity Reconciliation Act, Public Law 104–193, 110 Stat. 2105 (Aug. 22, 1996); Illegal Immigration Reform and Immigrant Responsibility Act, Public Law 104–208, 110 Stat. 3009 (Sept. 30, 1996); (8 U.S.C. 1373(c)); the REAL ID Act of 2005, Public Law 109–13, 119 Stat. 231 (May 11, 2005); Patient Protection and Affordable Care Act, Public Law 111–148, 124 Stat. 119 (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 Federal Aviation Administration (FAA) Extension, Safety, and Security Act of 2016, Public Law 114–190, 130 Stat. 615 (July 15, 2016), 8 CFR part 213a (Affidavits of Support on Behalf of Immigrants).

PURPOSE(S) OF THE SYSTEM:

The purpose of this system is to provide a service (fee-based for federal agencies) that assists federal, state, territorial, tribal, and local benefit-granting agencies, licensing bureaus, and other authorized entities for any legally mandated purpose in accordance with an authorizing statute to verify the U.S. citizenship and immigration status of individual, to include naturalized, derived, and U.S. citizens by birth, within their jurisdiction applying for benefits, and to otherwise efficiently administer their programs, to the extent that such disclosure is necessary to enable these agencies and entities to make decisions related to (1) determining eligibility for a federal, state, territorial, tribal, or local public benefit; (2) issuing a license or grant; (3) issuing a government credential; (4) conducting a background investigation; (5) voter verification or (6) any other lawful purpose. This system is also used for USCIS bond management purposes under section 213 of the Immigration and Nationality Act.

CATEGORIES OF INDIVIDUALS COVERED BY THE SYSTEM:

Categories of individuals covered by this system include: (1) individuals who

have filed, for themselves or on the behalf of others, applications or other requests for federal, state, territorial, tribal or local licenses or benefits; (2) individuals who are U.S. citizens, including those who are U.S. citizens by birth, and naturalized or acquired U.S. citizens; (3) individuals who have applied for or received other immigration benefits pursuant to 8 U.S.C. 1103 *et seq.* or other applicable law; (4) sponsors and household members listed on the Form I–864 or I–864EZ, *Affidavit of Support Under C Member; Section 213A of the Act* or Form I–864A, *Contract Between Sponsor and Household Member*; (5) individuals subject to certain background investigations; (6) individuals accessing SAVE Case Check; (7) users and administrators who access the system to facilitate U.S. citizenship and immigration status verification; and (8) other individuals whose information is verified with SAVE pursuant to an agreement between a user agency and SAVE (e.g., SAVE Memorandum of Agreement). All references to “sponsor” or “sponsors” include sponsors, joint sponsors, and substitute sponsors, as defined in the regulations at 8 CFR part 213a.

CATEGORIES OF RECORDS IN THE SYSTEM:

Information collected from the benefit applicant by the user agency to facilitate U.S. citizenship and immigration status verification may include the following:

- Individual’s full name (maiden name if applicable);
- Date of birth;
- Country of birth;
- Citizenship or nationality;
- Alien Registration Number (A-Number)/USCIS number;
- Other immigration number/enumerator (e.g., Employment Authorization Document card number, naturalization certificate number, citizenship certificate number);
- Form I–94, Arrival/Departure Record number;
- Visa number;
- Receipt number/card number;
- Student and Exchange Visitor Information System Identification number;
- Foreign Passport number and country of issuance;
- Social Security number (full and truncated) or other alternate number issued by the SSA (e.g., Individual Tax Identification Number (ITIN));
- U.S. Passport number;
- Driver’s license number;
- Agency Data Universal Numbering System (DUNS) number;
- Benefit type sought (e.g., background check, driver’s license/state

identification, education grant/loan/work study, Employment Authorization, housing assistance, Medicaid/Medical Assistance, Social Security number issuance, and voter verification); and

- Copies of original immigration documents.

Information collected from the user agency who accesses the system to facilitate U.S. citizenship and immigration status verification may include the following:

- Agency name;
- Address;
- Names of agency points(s) of contact;
- Title of agency point(s) of contact;
- Contact telephone number;
- Fax number;
- Email address;
- User identification; and
- Type of license/benefit(s) the agency issues (e.g., Unemployment Insurance, Educational Assistance, Driver Licensing, and Social Security Enumeration)

Information collected from the Social Security Administration used by SAVE to verify U.S. citizenship or immigration status of an applicant on behalf of a SAVE user agency:

- Social Security number match (True/False);
- Name match (True/False);
- Date of birth match (True/False);
- Death indicator (Yes Deceased/Not Deceased);
- Citizenship indicator;
 - “A”—U.S. citizen;
 - “B”—Legal alien, eligible to work;
 - “C”—Legal alien, not eligible to work;
 - “D”—Other;
 - “E”—Alien student-restricted work authorized; and
 - “F”—Conditionally legalized alien.
- Foreign Born Indicator (Citizenship code is not present, but individual was foreign born);
- Alien Registration Number (Alien Number or A-Number) (where applicable); and
- Error code descriptions (transaction and record levels).

System-generated responses because of the SAVE verification process may include:

- Verification case number; and
- SAVE response.

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 proceedings 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).

Individual information that may be used by SAVE to verify U.S. citizenship and immigration status and provide a SAVE response includes:

- Full name;
- Date of birth;
- Country of birth;
- Alien Registration Number (Alien Number or A-Number);
- Social Security number;
- Photograph;
- U.S. passport;
- Driver's license number or State identification number;
- Receipt number/card number (*e.g.*, Form I-551, *Lawful Permanent Resident Card*, Form I-766, *Employment Authorization Document*);
- Other unique identifying numbers (*e.g.*, Student and Exchange Visitor Information System Identification number, Form I-94 number, etc.);
- Visa number;
- Government-issued identification (*e.g.*, foreign passport);
 - Document type;
 - Country of issuance (COI);
 - Document number; and
 - Expiration date.
- Entry/Departure date;
- Port of entry;
- Alien status change date;
- Naturalization date;
- Date admitted until;
- Country of citizenship;
- Document grant date;
- Document receipt number;
- Codes (*e.g.*, class of admission, file control office, provision of law cited for employment authorization);
- Employment Authorization Document (EAD) history;

- Beneficiary information (*e.g.*, full name, Alien Registration Number, date of birth, country of birth, Social Security number);

- Petitioner information (*e.g.*, full name, Alien Registration Number, Social Security number, Individual Taxpayer Identification Number, Naturalization Certificate number); and

- Sponsor(s) and household member(s) information (*e.g.*, Full Name, Address, Social Security number).

SAVE may also access immigration case history for other individuals, including:

- Spouse information (*e.g.*, full name, Alien Registration Number, date of birth, country of birth, country of citizenship, class of admission, date of admission, receipt number, phone number, marriage date and location, naturalization date and location);

- Children information (*e.g.*, full name, Alien Registration Number, date of birth, country of birth, class of admission);

- Employer information (*e.g.*, full name, address, supervisor's name, supervisor's phone number); and

- Individuals associated with background checks information (*e.g.*, full name, Alien Registration Number, date of birth, country of birth).

Case history information may include:

- Alert(s);
- Case summary comments;
- Case category;
- Date of encounter;
- Encounter information;
- Custody actions and decisions;
- Case actions and decisions;
- Bonds;
- Photograph;
- Asylum applicant receipt date;
- Airline and flight number;
- Country of residence;
- City (*e.g.*, where boarded, where visa was issued);
- Date visa issued;
- Address in United States;
- Nationality;
- Decision memoranda; investigatory reports and materials compiled for the purpose of enforcing immigration laws;
- Exhibits;
- Transcripts; and
- Other case-related papers concerning aliens, alleged aliens, or lawful permanent residents brought into the administrative adjudication process.

RECORD SOURCE CATEGORIES:

Records are obtained from several sources including: (A) agencies and entities seeking to determine U.S. citizenship or immigration status of benefit applicants; (B) individuals seeking public licenses, benefits, or credentials; (C) other DHS components

assisting with enrollment and system maintenance processes; (D) information created by SAVE; (E) state or national organizations issuing and maintaining driver's license or state identification information such as the NLETS; and (F) information collected and covered by the following USCIS, DHS, and other federal agency systems of records:

- DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, September 18, 2017 (FR 82 FR 43556);
- DHS/USCIS-007 Benefits Information System, October 10, 2019 (84 FR 54622);
- DHS/USCIS-010 Asylum Information and Pre-Screening System of Records, November 30, 2015 (80 FR 74781);
- DHS/USCIS-018 Immigration Biometric and Background Check (IBBC) Records System of Records, July 31, 2018 (83 FR 36950);
- DHS/CBP-005 Advance Passenger Information System (APIS), March 13, 2015 (80 FR 13407);
- DHS/CBP-006 Automated Targeting System, May 22, 2012 (77 FR 30297);
- DHS/CBP-007 CBP Border Crossing Information (BCI), December 13, 2016 (81 FR 89957);
- DHS/CBP-011 U.S. Customs and Border Protection TECS, December 19, 2008 (73 FR 77778);
- DHS/CBP-016 Nonimmigrant Information System, March 13, 2015 (80 FR 13398);
- DHS/CBP-021 Arrival and Departure Information System (ADIS), November 18, 2015 (80 FR 72081);
- DHS/ICE-001 DHS/ICE-001 Student and Visitor Exchange Program (SEVP), December 8, 2021 (86 FR 69663);
- DHS/ICE-011 Criminal Arrest Records and Immigration Enforcement Records (CARIER) System of Records, July 5, 2024 (89 FR 55638);
- DHS/ALL-003 Department of Homeland Security General Training Records, November 25, 2008 (73 FR 71656);
- DHS/ALL-016 Correspondence Records, September 26, 2018 (83 FR 48645);
- JUSTICE/EOIR-002, Office of the Chief Administrative Hearing Officer (OCAHO) Case Management System (CMS) August 16, 2019 (84 FR 42016);
- STATE-05 Overseas Citizens Services Records and Other Overseas Records, November 20, 2023 (88 FR 80804);
- STATE-26 Passport Records, March 24, 2015 (80 FR 15653);
- STATE-39 Visa Records, November 8, 2021 (86 FR 61822) and

• SSA-60-0058 Master Files of Social Security Number Holders and Social Security Number Applications, February 20, 2025 (90 FR 10025)

ROUTINE USES OF RECORDS MAINTAINED IN THE SYSTEM, INCLUDING CATEGORIES OF USERS AND PURPOSES OF SUCH USES:

In addition to those disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act, all or a portion of the records or information contained in this system may be disclosed outside DHS as a routine use pursuant to 5 U.S.C. 552a(b)(3) as follows:

A. To the Department of Justice (DOJ), including the U.S. Attorneys Offices, or other federal agency conducting litigation or proceedings before any court, adjudicative, or administrative body, when it is relevant or necessary to the litigation and one of the following is a party to the litigation or has an interest in such litigation:

1. DHS or any component thereof;
2. Any employee or former employee of DHS in his/her official capacity;
3. Any employee or former employee of DHS in his/her individual capacity, only when DOJ or DHS has agreed to represent the employee; or
4. The United States or any agency thereof.

B. To a congressional office from the record of an individual in response to an inquiry from that congressional office made at the request of the individual to whom the record pertains.

C. To the National Archives and Records Administration (NARA) or General Services Administration pursuant to records management inspections being conducted under the authority of 44 U.S.C. 2904 and 2906.

D. To an agency or organization for the purpose of performing audit or oversight operations as authorized by law, but only such information as is necessary and relevant to such audit or oversight function.

E. To appropriate agencies, entities, and persons when (1) DHS suspects or has confirmed that there has been a breach of the system of records; (2) DHS has determined that as a result of the suspected or confirmed breach there is a risk of harm to individuals, DHS (including its information systems, programs, and operations), the Federal Government, or national security; and (3) the disclosure made to such agencies, entities, and persons is reasonably necessary to assist in connection with DHS's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm.

F. To another Federal agency or Federal entity, when DHS determines

that information from this system of records is reasonably necessary to assist the recipient agency or entity in (1) responding to a suspected or confirmed breach or (2) preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity (including its information systems, programs, and operations), the Federal Government, or national security, resulting from a suspected or confirmed breach.

G. To an appropriate federal, state, territorial, tribal, local, international, or foreign law enforcement agency or other appropriate authority charged with investigating or prosecuting a violation or enforcing or implementing a law, rule, regulation, or order, when a record, either on its face or in conjunction with other information, indicates a violation or potential violation of law, which includes criminal, civil, or regulatory violations and such disclosure is proper and consistent with the official duties of the person making the disclosure.

H. To contractors and their agents, grantees, experts, consultants, and others performing or working on a contract, service, grant, cooperative agreement, or other assignment for DHS, when necessary to accomplish an agency function related to this system of records. Individuals provided information under this routine use are subject to the same Privacy Act requirements and limitations on disclosure as are applicable to DHS officers and employees.

I. To approved federal, state, territorial, tribal, and local government agencies for any legally mandated purpose (e.g., benefits, licensing, voter verification) in accordance with their authorizing statute or law and when an approved agreement (e.g., Memorandum of Agreement (MOA) or Computer Matching Agreement (CMA)) is in place between DHS and the entity.

J. To a federal, state, territorial, tribal, or local government agency that oversees or administers Federal means-tested public benefits for purposes of seeking reimbursement from sponsors for the value of benefits provided to sponsored applicants, as well as reporting on overall sponsor deeming and agency reimbursement efforts to appropriate administrative and oversight agencies.

K. To airport operators to determine the eligibility of individuals seeking unescorted access to any Security Identification Display Area of an airport, as required by the Federal Aviation Administration (FAA) Extension, Safety, and Security Act of 2016.

L. To the Social Security Administration and other federal, state,

tribal, territorial, local, governments and other authorized entities to assist user agencies determine U.S. citizenship and immigration status of an individual when a DHS approved agreement is in place between DHS and the entity.

M. To federal, state, territorial, tribal, local, and other entities that have legal authority to provide oversight to programs and benefits supported by SAVE for auditing of program requirements and when a DHS-approved agreement (e.g., Memorandum of Agreement (MOA) or Computer Matching Agreement (CMA)) is in place between DHS and the entity.

N. To the news media and the public, with the approval of the Chief Privacy Officer in consultation with counsel, when there exists a legitimate public interest in the disclosure of the information, when disclosure is necessary to preserve confidence in the integrity of DHS, or when disclosure is necessary to demonstrate the accountability of DHS's officers, employees, or individuals covered by the system, except to the extent the Chief Privacy Officer determines that release of the specific information in the context of a particular case would constitute a clearly unwarranted invasion of personal privacy.

POLICIES AND PRACTICES FOR STORAGE OF RECORDS:

DHS/USCIS stores records in this system electronically or on paper in secure facilities in a locked drawer behind a locked door. The records may be stored on magnetic discs, tapes, and digital media. Additionally, information is located within the USCIS Verification Data Integration Service SAVE Program.

POLICIES AND PRACTICES FOR RETRIEVAL OF RECORDS

DHS/USCIS retrieves records by name of applicant or other unique identifier including, but not limited to Verification Case Number, Alien Registration Number (Alien Number or A-Number), I-94 Number, Social Security number, Passport number, Driver's license number, Visa number, Student and Exchange Visitor Information System Identification number, or by the submitting agency name.

POLICIES AND PRACTICES FOR RETENTION AND DISPOSAL OF RECORDS:

SAVE records are covered by NARA-approved records retention and disposal schedule, N1-566-08-07. Records collected in the process of enrolling in SAVE and in verifying U.S. citizenship or immigration status are stored and retained in SAVE for ten (10) years from the date of the completion of

verification. However, if the records are part of an ongoing investigation, they will be retained until completion of the investigation and pursuant to the records retention schedule associated with the investigation. This initial 10-year 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).

ADMINISTRATIVE, TECHNICAL, AND PHYSICAL SAFEGUARDS:

DHS/USCIS safeguards records in this system according to applicable rules and policies, including all applicable DHS automated systems security and access policies. USCIS has imposed strict controls to minimize the risk of compromising the information that is being stored. Access to the computer system containing the records in this system is limited to those individuals who have a need to know the information for the performance of their official duties and who have appropriate clearances or permissions.

RECORD ACCESS PROCEDURES:

Absent an authorized exception for disclosure exists, the U.S. Department of Homeland Security protects and withholds the Privacy Act of 1974/ Judicial Redress Act of 2015 covered records by law for U.S. citizens, lawful permanent residents, and Judicial Redress Act covered persons from covered countries.

Individuals seeking access to and notification of any record contained in this system of records, or seeking to contest its content, may submit a request online at <https://first.uscis.gov/> or submit a request in writing to the Chief Privacy Officer and to the USCIS FOIA/Privacy Act Officer whose contact information can be found at <http://www.dhs.gov/foia> under "Contacts Information." If an individual believes more than one component maintains Privacy Act records concerning him or her, the individual may submit the request to the Chief Privacy Officer and Chief Freedom of Information Act Officer, Department of Homeland Security, Washington, DC 20528-0655. Even if neither the Privacy Act nor the Judicial Redress Act provide a right of access, certain records about him or her may be available under the Freedom of Information Act.

When an individual is seeking records about himself or herself from this system of records or any other Departmental system of records, the individual's request must conform with

the Privacy Act regulations set forth in 6 CFR part 5. The individual must first verify his/her identity, meaning that the individual must provide his/her full name, current address, and date and place of birth. The individual must sign the request, and the individual's signature must either be notarized or submitted under 28 U.S.C. 1746, a law that permits statements to be made under penalty of perjury as a substitute for notarization. While no specific form is required, an individual may obtain forms for this purpose from the Chief Privacy Officer and Chief Freedom of Information Act Officer, <http://www.dhs.gov/foia> or 1-866-431-0486. In addition, the individual should:

- Explain why the individual believes the Department would have information on him/her;
- Identify which component(s) of the Department the individual believes may have the information about him/her;
- Specify when the individual believes the records would have been created; and
- Provide any other information that will help the FOIA staff determine which DHS component agency may have responsive records.

If an individual's request is seeking records pertaining to another living individual, the first individual must include a statement from the second individual certifying his/her agreement for the first individual to access his/her records.

Without the above information, the component(s) may not be able to conduct an effective search, and the individual's request may be denied due to lack of specificity or lack of compliance with applicable regulations.

CONTESTING RECORD PROCEDURES:

For records covered by the Privacy Act or covered the Judicial Redress Act records, see "Record Access Procedures" above. For records not covered by the Privacy Act or Judicial Redress Act, individuals may still amend their records at a USCIS Field Office by contacting the USCIS Contact Center at 1-800-375-5283 (TTY 800-767-1833) to request an appointment.

NOTIFICATION PROCEDURES:

See "Record Access Procedures."

EXEMPTIONS PROMULGATED FOR THE SYSTEM:

None. However, when this system receives a record from another system exempted in that source system under 5 U.S.C. 552a, DHS will claim the same exemptions for those records that are claimed for the original primary systems of records from which they originated.

HISTORY:

85 FR 31798 (May 27, 2020); 81 FR 78619 (November 8, 2016); 76 FR 58525 (September 21, 2011); 73 FR 75445 (December 11, 2008); 73 FR 10793 (February 28, 2008); 72 FR 17569 (April 9, 2007); 67 FR 64134 (October 17, 2002); and 66 FR 46812 (September 7, 2001).

* * * * *

Roman Jankowski,

Chief Privacy Officer, U.S. Department of Homeland Security.

[FR Doc. 2025-19735 Filed 10-30-25; 8:45 am]

BILLING CODE 9111-97-P

DEPARTMENT OF THE INTERIOR

National Indian Gaming Commission

Fee Rate and Fingerprint Fees

AGENCY: National Indian Gaming Commission, Interior.

ACTION: Notice.

SUMMARY: Notice is hereby given that the National Indian Gaming Commission has adopted its annual fee rates of 0.00% for tier 1 and 0.08% (.0008) for tier 2, which maintain the current fee rates. These rates shall apply to all assessable gross revenues from each gaming operation under the jurisdiction of the Commission. If a tribe has a certificate of self-regulation, the fee rate on Class II revenues shall be 0.04% (.0004) which is one-half of the annual fee rate. The annual fee rates are effective November 1, 2025, and will remain in effect until new rates are adopted. The National Indian Gaming Commission has also adopted its fingerprint processing fee of \$44 per card which remains the same as current fingerprint processing fee. The fingerprint processing fee is effective November 1, 2025, and will remain in effect until the Commission adopts a new rate.

FOR FURTHER INFORMATION CONTACT:

Yvonne Lee, National Indian Gaming Commission, 1849 C Street NW, Mail Stop #1621, Washington, DC 20240; telephone (202) 632-7003; fax (202) 632-7066.

SUPPLEMENTARY INFORMATION: The Indian Gaming Regulatory Act (IGRA) established the National Indian Gaming Commission, which is charged with regulating gaming on Indian lands.

Commission regulations (25 CFR 514) provide for a system of fee assessment and payment that is self-administered by gaming operations. Pursuant to those regulations, the Commission is required to adopt and communicate assessment



Privacy Impact Assessment

for the

Systematic Alien Verification for Entitlements “SAVE” Program

DHS Reference No. DHS/USCIS/PIA-006(d)

October 31, 2025



Homeland
Security



Abstract

1. The abstract is the single paragraph that will be used to describe the program and the Privacy Impact Assessment.¹

The U.S. Department of Homeland Security, U.S. Citizenship and Immigration Services, Verification Division administers the Systematic Alien Verification for Entitlements (SAVE) Program. The SAVE Program is an online inter-governmental service designed to help federal, state, territorial, tribal, local government agencies, benefit-granting agencies, other authorized entities and licensing bureaus, as authorized by law, determine citizenship and immigration status of individuals within their jurisdiction for the purpose of granting benefits, licenses, as well as for other lawful purposes. U.S. Citizenship and Immigration Services is publishing an update to this Privacy Impact Assessment to describe the collection, use, maintenance, and disclosure of personally identifiable information, as well as the risks associated with these updates. The purpose of this update is to discuss the changes to the tool, including: (1) documenting use of the tool for voter registration and voter maintenance list verification, (2) collection of Social Security numbers which may include those of U.S. born citizens for all benefit or license related uses of the program, (3) sharing of information between U.S. Citizenship and Immigration Services, the Social Security Administration, and the Department of State, (4) a new bulk upload feature for the program, and (5) reducing the fee for non-Federal government agencies.

Overview

2. The overview provides the context and background necessary to understand the project's purpose and mission and the justification for operating a privacy sensitive project.

The U.S. Citizenship and Immigration Services administers the SAVE Program. The SAVE Program is an online fee-based intergovernmental initiative designed to help federal, state, tribal, and local government agencies and licensing bureaus confirm immigration status information.²

¹ Pursuant to Section 208 of the E-Government Act of 2002, agencies are required to conduct a Privacy Impact Assessment before developing or procuring Information Technology systems or projects that collect, maintain or disseminate information in identifiable form from or about members of the public. The Office of Management and Budget issued Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, which defines "information in identifiable form" as information in an Information Technology system or online collection: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements. Furthermore, an individual is defined as "a citizen of the United States or an alien lawfully admitted for permanent residence."

² It is the intent of the current Administration to provide more of a supporting role to state, local, tribal, and territory governments. The U.S. Department of Homeland Security has determined to better serve and support non-Federal



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The SAVE Program provides status verifications to requesting federal, state, territorial, tribal, and local government agencies; benefit granting agencies; and other authorized entities and licensing bureaus. The U.S. Citizenship and Immigration Services (or a contractor acting on its behalf) will confirm immigration and/or United States citizenship status as authorized by law, to the extent that such disclosure is necessary to enable these agencies to make decisions. These decisions may relate to: (1) determining eligibility for a federal, state, or local public benefit; (2) issuing a license or grant; (3) issuing a government credential; (4) conducting a background investigation; (5) registering voters or developing/ managing voter maintenance lists; or (6) any other lawful purpose.

A federal, state, territorial, tribal, or local government agency that provides a public benefit or license, or that is otherwise authorized by law to engage in an activity related to the verification of immigration status, may enroll in the SAVE Program as a registered agency. By using the SAVE Program, federal, state, territorial, tribal, and local registered agencies can request immigration status information to determine the applicant's eligibility for a benefit or a license. It is important to note that the program does not make the determinations on an applicant's eligibility for a specific benefit or license or eligibility to vote (at the local, state, or national level). Instead, it provides immigration status information to agencies to allow them to make an informed decision prior to issuing benefits or licenses or denying voting benefits. The registered agency analyzes the SAVE Program's response against the agency's own eligibility criteria to make an award determination. The SAVE Program may not always know the outcome of the benefit adjudication.

The SAVE Program has access to multiple immigration record systems from government agencies to confirm immigration status. All SAVE Program-registered agencies must adhere to a Memorandum of Agreement or Computer Matching Agreement, which include binding responsibilities regarding proper information usage and handling. The Memorandum of Agreement also stipulates the terms for billing and payment, if applicable. As part of its billing and registration process, the SAVE Program collects personally identifiable information, such as the registered agency's point of contact name and professional contact information, as well as registered agency and demographic information. The SAVE Program staff may also collect sensitive information such as registered agency credit card information and other data relevant to the billing process from the federal, state, territorial, tribal, or local government agencies using the SAVE Program. The U.S. Citizenship and Immigration Service collects, maintains, and safeguards this information in accordance with U.S. Department of Homeland Security privacy and information technology policies.

The U.S. Citizenship and Immigration Services is currently implementing a comprehensive

government agencies, by eliminating the fees for their use of the SAVE Program.



Homeland Security

optimization of the SAVE Program. The U.S. Citizenship and Immigration Services has developed a phased approach to further the U.S. Department of Homeland Security mission. This Privacy Impact Assessment supports use of the SAVE Program for (1) voter registration and voter maintenance list verification; (2) collection of Social Security numbers, which may include those of U.S. born citizens for all benefit- or license-related uses of the program; (3) sharing of information between U.S. Citizenship and Immigration Services, the Social Security Administration, and the Department of State; (4) a new bulk upload feature for the program; and (5) removing the fee for non-Federal government agencies.

Social Security Administration Data Sharing

On January 20, 2025, and March 25, 2025, the President issued Executive Orders 14159, *Protecting the American People Against Invasion* and 14248, *Preserving and Protecting the Integrity of American Elections* respectively.³ Executive Order 14159 includes a requirement for the Secretary to “...promptly issue guidance to ensure maximum compliance by [Department of Homeland Security] personnel with the provisions of 8 U.S.C. 1373 and 8 U.S.C. 1644 and ensure that State and local governments are provided with the information necessary to fulfill law enforcement, citizenship, or immigration status verification requirements authorized by law....”⁴ Executive Order 14248 outlines that, “...Federal laws, such as the National Voter Registration Act (Pub. L. 103-31) and the Help America Vote Act (Pub. L. 107-252), require States to maintain an accurate and current Statewide list of every legally registered voter in the State. And [Department of Homeland Security] is required to share database information with States upon request so they can fulfill this duty.”⁵ Executive Order 14248 directs the Secretary to “...ensure that State and local officials have, without the requirement of the payment of a fee, access to appropriate systems for verifying the citizenship or immigration status of individuals registering to vote or who are already registered...” The Department of Homeland Security is also required under Executive Order 14248, in coordination with the Department of Government Efficiency Administrator, to “review each State’s publicly available voter registration list and available records concerning voter list maintenance activities as required by 52 U.S.C. § 20507, alongside Federal immigration databases and State records requested, including through subpoena where necessary and authorized by law, for consistency with Federal requirements.”

The Commissioner of Social Security also must assist states in determining whether individuals are eligible to register and vote by taking all appropriate action to make available the Social

³ See *Protecting the American People Against Invasion* (January 2025) available at <https://www.federalregister.gov/documents/2025/03/28/2025-05523/preserving-and-protecting-the-integrity-of-american-elections>; and *Preserving and Protecting the Integrity of American Elections* (March 2025) available at <https://www.federalregister.gov/documents/2025/01/29/2025-02006/protecting-the-american-people-against-invasion>.

⁴ 8 U.S.C. § 1373; 8 U.S.C. § 1644.

⁵ 8 U.S.C. 1373(c).



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Security Number Verification Service, the Death Master File, and any other Federal databases containing relevant information to all State and local election officials engaged in verifying the eligibility of individuals registering to vote or who are already registered.⁶

Most registered agencies may not have access in their voter, benefits, or licenses records to a U.S. Department of Homeland Security-issued identifier, (such as Alien Registration Number (Alien Number or A-number), Naturalization Certificate number, or Citizenship Certificate number) to initiate the initial SAVE Program query. To address this concern, the U.S. Citizenship and Immigration Services is incorporating a feature to allow SAVE Program-registered agencies to query records by Social Security numbers. Registered agencies will provide the U.S. Citizenship and Immigration Services with the individual's first and last name(s), date of birth and a full 9-digit or partial Social Security number. Registered agencies may additionally provide a U.S. Department of Homeland Security enumerator. The U.S. Citizenship and Immigration Services will provide the Social Security Administration with this information and in turn they will provide the U. S. Citizenship and Immigration Service with the following responses:

- Social Security number match (True/False);
- Name match (True/False);
- Date of birth match (True/False);
- Citizenship Indicator;
 - "A" - U.S. citizen;
 - "B" - Legal alien, eligible to work;
 - "C" - Legal alien, not eligible to work;
 - "D" – Other;
 - "E" - Alien student - restricted work authorized; and
 - "F" - Conditionally legalized alien.
- Foreign Born indicator (Citizenship code is not present, but individual was foreign born);
- State/Country code;
- American Samoa indicator (True/False);
- Alien Registration number (where applicable);

⁶ Executive Order 14248 § 3(a).



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- Death indicator (Yes / No); and
- Error code descriptions (transaction and record levels).

Of note, if a registered agency provides the names, dates of birth, and Social Security numbers of U.S. citizens by birth, the SAVE Program will maintain and process this information. For instance, a state may provide the U.S. Citizenship and Immigration Services information for all residents that are registered to vote within their jurisdiction. This would include U.S. citizens by birth. The U. S. Citizenship and Immigration Services will process this information as stated above and provide the appropriate response.

The SAVE Program now has a list processor feature to allow registered agencies to upload a list of individuals' case data instead of creating individual cases. A requesting agency, once signed into the program, will have an option to "upload" a list of individuals for the U.S. Citizenship and Immigration Services to verify citizenship and immigration status. Once uploaded, the SAVE Program creates individual cases for everyone identified on the uploaded list. The U. S. Citizenship and Immigration Services then sends from the list to the Social Security Administration the name, Social Security number, and date of birth of the individuals identified by the registered agency. The Social Security Administration then sends the status information (citizenship indicator noted above) back to the SAVE Program. The SAVE Program, if required, also queries other various systems (see below *List of Federal Systems Used to Respond to Registered Agency Queries*), and provides a consolidated result in each case file. The registered agency has the option of logging back into the program after twenty-four hours and searching for each case or generating a Web Agency Audit Report within the SAVE Program that can provide status information for multiple cases.

Additionally, program users will be able to download a list of individuals from the original list that the registered agency submitted, that the U.S. Citizenship and Immigration Services was not able to process. For example, a registered agency's list may not have a unique identifier for several individuals. To capture these incomplete cases, the program creates a spreadsheet that includes everyone who is not processed and requests additional information such as a Social Security number (corrected Social Security number), or Alien Registration Number. The registered agency can then update the spreadsheet provided with the additional information and upload it again into the program. The U.S. Citizenship and Immigration Services then provides the registered agency's account with the following information:

- Verification number (SAVE Program generated);
- Initial request date;
- Identification type;



- Identification number;
- Last name;
- Benefit code;
- Benefit description;
- Initial request response (Lawful status, No lawful status, Deceased);
- Additional request date;
- Additional request response (Lawful status, No lawful status, Deceased);
- Third step request date;
- Third step resolution (Lawful status, No lawful status, Deceased); and
- Closed date.

Department of State Data Sharing

Registered agencies may provide either a U.S. passport number or a photocopy of a U.S. passport as documentation of citizenship or immigration status. If a U.S. passport number is submitted, the SAVE Program will verify it against information from U.S. Department of State-issued passport. Additionally, the SAVE Program will receive or access information in the U.S. Department of State's Consular Consolidated Database / American Citizen Record Query system, which is a consular search engine used by the U.S. Department of State to manage and access records related to United States citizens, particularly for consular protection and services, including managing passport requests and applications.

State Driver's Licensing Agencies and Other Organizations Maintaining Driver's License Information Data Sharing

Within the U.S., driver's licenses are the most widely used form of identification. The SAVE Program can use driver's license and state identification card numbers to check and confirm identity information by working with state driver's licensing agencies and national agencies that store driver's license information for legal purposes (such as the National Law Enforcement Telecommunications System). When the registered agency provides a driver's license or state identification card number as the enumerator to verify the identity of the applicant, the SAVE Program will use state driver's licensing agencies or another source (such as the National Law Enforcement Telecommunications System) to validate the information and gain access to other government enumerators. This will allow the SAVE Program to match against other sources to verify immigration status and U.S. citizenship, which will improve accuracy and efficiency for SAVE registered agencies.



Auditing of Federal and State Oversight Programs Data Sharing

The SAVE Program will support organizations that have entered into required agreements with the U.S. Citizenship and Immigration Services and have a legal oversight authority over a program or benefit type supported by the SAVE Program through reporting capabilities for auditing purposes. User agencies with a legal authority to monitor and audit benefits granted may view case data such as biographic data, enumerators, case submission date/time, and the SAVE Program response information. Reporting options exist for individual agencies and their case data. Additionally, user agencies with legal authority may now be granted SAVE Program access to view other user agencies' case data through a linking mechanism based on either benefit type granted (e.g. Medicare) or by state. This new account type will have reporting options to view case data. Other account types enable user agencies to create cases within the SAVE Program to verify applicant current eligibility for benefits previously granted. This will allow federal and state oversight agencies to ensure user agencies are properly verifying immigration status or citizenship before making an eligibility determination. Oversight agencies can also ensure previously approved applicants remain eligible for the benefits they are receiving.

List of Federal Systems Used to Respond to Registered Agency Queries

The following is a list of federal information systems that the SAVE Program queries for responses to registered agencies:

United States Citizenship and Immigration Services Systems:

- Central Index System;⁷
- Electronic Immigration System;⁸
- Computer Linked Application Information Management System 3;⁹
- Enterprise Citizenship and Immigration Services Centralized Operational Repository;¹⁰
- GLOBAL (not an acronym);

⁷ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE CENTRAL INDEX SYSTEM, DHS/USCIS/PIA-009, available at [Privacy Documents for USCIS | Homeland Security](#).

⁸ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE USCIS ELECTRONIC IMMIGRATION SYSTEM, DHS/USCIS/PIA-056, available at [Privacy Documents for USCIS | Homeland Security](#).

⁹ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE COMPUTER LINKED APPLICATION INFORMATION MANAGEMENT SYSTEM AND ASSOCIATED SYSTEMS, DHS/USCIS/PIA-016, available at [Privacy Documents for USCIS | Homeland Security](#).

¹⁰ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE ENTERPRISE CITIZENSHIP AND IMMIGRATIONS SERVICES CENTRALIZED OPERATIONAL REPOSITORY, DHS/USCIS/PIA-023, available at [Privacy Documents for USCIS | Homeland Security](#).



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- RAILS (not an acronym);¹¹
- Customer Profile Management System;¹² and
- Salesforce Customer Relationship Management Customer Relationship Management.

Other U.S. Department of Homeland Security Systems:

- U.S. Department of Homeland Security OneNet;
- U.S. Immigration and Customs Enforcement Student and Exchange Visitor Program;¹³
- U.S. Immigration and Customs Enforcement, Enforcement Integrated Database;¹⁴
- U.S. Customs and Border Protection Arrival and Departure Information System;¹⁵ and
- Transportation Security Administration Office of Intelligence and Analysis Technology Infrastructure Modernization Program.¹⁶

Other Federal Agency Systems:

- U.S. Military Entrance Processing Command Integrated Resource System;
- U.S. Department of Education Federal Student Aid Central Processing System;
- U.S. Department of Health and Human Services Centers for Medicare & Medicaid Services;
- U.S. Social Security Administration Numident system;
- U.S. Department of Justice Executive Office for Immigration's Immigration Review Information Exchange System;

¹¹ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR RAILS, DHS/USCIS/PIA-075, *available at* [Privacy Documents for USCIS | Homeland Security](#).

¹² See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE CUSTOMER PROFILE MANAGEMENT SERVICE, DHS/USCIS/PIA-060, *available at* [Privacy Documents for USCIS | Homeland Security](#).

¹³ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT, PRIVACY IMPACT ASSESSMENT FOR THE STUDENT AND EXCHANGE VISITOR PROGRAM, DHS/ICE/PIA-001, *available at* [Privacy Documents for ICE | Homeland Security](#).

¹⁴ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT, PRIVACY IMPACT ASSESSMENT FOR THE ENFORCEMENT INTEGRATED DATABASE, DHS/ICE/PIA-015, *available at* [Privacy Documents for ICE | Homeland Security](#).

¹⁵ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CUSTOMS AND BORDER PROTECTION, PRIVACY IMPACT ASSESSMENT FOR THE ARRIVAL AND DEPARTURE INFORMATION SYSTEM, DHS/CBP/PIA-024, *available at* [Privacy Documents for CBP | Homeland Security](#).

¹⁶ See U.S. DEPARTMENT OF HOMELAND SECURITY, TRANSPORTATION SECURITY ADMINISTRATION, PRIVACY IMPACT ASSESSMENT FOR THE TRANSPORTATION SECURITY ADMINISTRATION OFFICE OF INTELLIGENCE AND ANALYSIS TECHNOLOGY INFRASTRUCTURE MODERNIZATION PROGRAM, DHS/TSA/PIA-042, *available at* [Privacy Documents for TSA | Homeland Security](#).



- U.S. Department of State Consular Consolidated Database; and
- U.S. Department of State American Citizen Record Query System.

Fair Information Practice Principles

The U.S. Department of Homeland Security conducts Privacy Impact Assessments on developed or procured information technology systems involving the collection, maintenance, or dissemination of information in identifiable form or that make substantial changes to existing information technology that manages information in identifiable form, as required by Public Law 107-347, Section 208, “The E-Government Act of 2002,” and any applicable and implementing Office of Management and Budget guidance; or proposed rulemakings affecting personal information as required by Section 222(a)(4) of the Homeland Security Act of 2002; or technologies that sustain, and do not erode, privacy protections relating to the use, collection, and disclosure of personal information pursuant to 6 U.S.C § 142(a)(1).

In response to these obligations, the U.S. Department of Homeland Security Privacy Office developed a set of Fair Information Practice Principles¹⁷ from the underlying concepts of the Privacy Act of 1974¹⁸ to encompass the full scope of the information and interactions of the U.S. Department of Homeland Security. The Fair Information Practice Principles account for the nature and purpose of the information being collected in relation to the U.S. Department of Homeland Security’s mission to preserve, protect, and secure. The Fair Information Practice Principles are a set of eight principles that are rooted in the tenets of the Privacy Act.

3. What specific legal authorities and/or agreements permit the collection of information by the project in question?

In accordance with a 1986 Congress mandate, the U.S. Citizenship and Immigration Services, previously the Immigration and Naturalization Service, established the SAVE Program to verify the citizenship and immigration status of individuals seeking government benefits for use by benefit granting agencies when making benefit determinations. The following provides authority for the program to collect, maintain, and share personally identifiable information:

- Immigration and Nationality Act, Public Law 82-414, 66 Statutory 163 (June 27, 1952);
- Homeland Security Act of 2002, Public Law Number 107-296, 116 Statutory 2135

¹⁷ U.S. Department of Homeland Security, Privacy Policy Guidance Memorandum 2008-01, The Fair Information Practice Principles: Framework for Privacy Policy at the Department of Homeland Security (2008), *available at* <https://www.dhs.gov/privacy-policy-guidance>.

¹⁸ Privacy Act of 1974, 5 U.S.C. § 552a, as amended.



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(November 25, 2002);

- Immigration Reform and Control Act of 1986, Public Law 99-603, 11 Statutory 3359 (November 6, 1986);
- Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Public Law 104-193, 110 Statutory 2105 (August 22, 1996);
- Title IV, Subtitle A, of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, Public Law 104-208, 110 Statutory 3009 (September 30, 1996);
- Real ID Act of 2005, Public Law 109-13, 119 Statutory 231 (May 11, 2005);
- Patient Protection and Affordable Care Act of 2010, Pub. L. No. 111-148, 124 Statutory 119 (Mar. 23, 2010), as amended by the Health Care and Education Reconciliation Act of 2010, Public Law 111-152, 124 Stat. 1029 (March 30, 2010);
- Federal Aviation Administration Extension, Safety and Security Act of 2016, Public Law 114-190, 130 Statutory 615 (July 15, 2016); and
- Social Security Act of 1935, Public Law 74-271, 49 Statutory 620 (Aug. 14, 1935) as amended, 42 U.S.C. § 1306.

In addition, the Systematic Alien Verification for Entitlements Program has an obligation under 8 U.S.C. 1373(c) to “respond to an inquiry by a federal, state or local government agency, seeking to verify or ascertain the citizenship or immigration status of any individual within the jurisdiction of the agency for any purpose authorized by law, by providing the requested verification or status information.”

The Social Security Administration is aiding by sending to, and receiving, U.S. Department of Homeland Security and U.S. Citizenship and Immigration Services information regarding the citizenship or immigration status, lawful or unlawful, of individuals within its records. The Social Security Administration is authorized to participate in this information sharing under the authority of the Social Security Act, 42 U.S.C. § 1306, and pursuant to 8 U.S.C. § 1373(a).

4. Will this information be maintained as part of system of records,¹⁹ as defined in the Privacy Act, 5 U.S.C. §552a?

¹⁹ The term “system of records” means a group of any records under the control of any agency from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual.



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Yes, information retrieved by the Social Security Administration, U.S. Department of State, and registered agencies will be maintained in the DHS/USCIS-004 Systematic Alien Verification for Entitlements (SAVE) Program System of Records.²⁰

5. From which population does the project collect, maintain, use, and/or disseminate personally identifiable information?²¹

- ☒ a. Members of the public
- ☐ b. U.S. Department of Homeland Security employees and/or contractors
- ☐ c. Other federal employees

6. What personally identifiable information is collected, maintained, used, or disseminated?

The U.S. Citizenship and Immigration Services may collect the following information about aliens; legal permanent residents; and U.S. born, naturalized, and derived citizens from registered agencies:

- Name (last, first, middle);
- Unique identifiers;
 - Alien Registration Number (Alien number or A-Number)/U. S. Citizenship and Immigration Services Number;
 - I-94 Arrival/Departure Record number;
 - Student and Exchange Visitor Information System Identification number;
 - Receipt number/card number;
 - Naturalized Certificate number; and
 - Citizenship Certificate number.

²⁰ See DHS/USCIS-004 Systematic Alien Verification for Entitlements, 90 Fed. Reg. 48948 (October 31, 2025), available at [System of Records Notices | Homeland Security](#).

²¹ Personally identifiable information means any information about an individual maintained by an agency, including, but not limited to, education, financial transactions, medical history, and criminal or employment history and information which can be used to distinguish or trace an individual's identity, such as their name, social security number, date and place of birth, mother's maiden name, biometric records, etc., including any other personal information which is linked or linkable to an individual. See [OMB M-06-19, Reporting Incidents Involving Personally Identifiable Information](#).



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- Visa or Passport (Foreign and/or United States) numbers;
- Social Security number or Individual Tax Identification Number;
- Driver's license or state identification number;
- Date of birth;
- Country of birth;
- Citizenship or nationality;
- Class of Admission code and Date of entry;
- File Control Office;
- Benefit sought; and
- Immigration documentation.

The United States Citizenship and Immigration Services shares the following information to the Social Security Administration about U.S. born, naturalized, and/or derived citizens:

- Name (last, first, middle);
- Date of birth;
- Social Security number (full and partial); and
- U.S. Department of Homeland Security-issued identifier (such as Alien Registration Number).

The U. S. Citizenship and Immigration Services maintains the following information from the Social Security Administration:

- Social Security number match (True/False);
- Name match (True/False);
- Date of birth match (True/False);
- Citizenship indicator;
 - "A" - U.S. citizen;
 - "B" - Legal alien, eligible to work;
 - "C" - Legal alien, not eligible to work;
 - "D" - Other;
 - "E" - Alien student - restricted work authorized; and



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○ "F" - Conditionally legalized alien.

- Foreign Born indicator (Citizenship code is not present, but individual was foreign born);
- State/country code;
- American Samoa indicator (True/False);
- Alien Registration Number (Alien Number or A-Number) (where applicable);
- Death indicator (Yes / No); and
- Error code descriptions (transaction and record levels).

The United States Citizenship and Immigration Services provides the following information to requesting agencies:

- Verification number (system generated);
- Initial request date;
- Identification type;
- Identification number;
- Last name;
- Benefit code;
- Benefit description;
- Initial request response (lawful status, no lawful status, deceased);
- Additional request date;
- Additional request response (lawful status, no lawful status, deceased);
- Third step request date;
- Third step resolution (lawful status, no lawful status, deceased); and
- Closed date.

The U.S. Citizenship and Immigration Services shares the following information to the U.S. Department of State:

- Full name;
- Date of birth;



- Social Security number; and/or
- U.S. passport number.

The U.S. Citizenship and Immigration Services may maintain the following information from the U.S. Department of State:

- Full name;
- Date of birth;
- Certificate of Citizenship;
- Certificate of Naturalization;
- Alien Registration Number (Alien Number or A-Number);
- U.S. passport book or passport card number;
- U.S. passport book or passport card issuance date;
- U.S. passport endorsement code(s) where applicable; and
- Images of U.S. passport book or passport card.

7. What is the intended use of personally identifiable information?

The SAVE Program uses personally identifiable information about individuals to help federal, state, territorial, tribal, and local government benefit-granting agencies, other authorized entities and licensing bureaus, as authorized by law, verify the citizenship and/or immigration status of individuals within their jurisdiction as they determine eligibility for benefits, credentials, and licenses; and verify voter registration. The U.S. Citizenship and Immigration Services also uses the personally identifiable information for federal security background investigations and other lawful purposes.

The U.S. Citizenship and Immigration Services uses a variety of data for cross-referencing. In this way, the U. S. Citizenship and Immigration Services ensures that data is accurate and current, identifies inconsistencies between or among databases, and minimizes fraud. Additionally, the U.S. Citizenship and Immigration Services collects personally identifiable information from individual users of the system to provide accountability of system usage in the event of misuse and abuse of the system. Further, the U. S. Citizenship and Immigration Services use personally identifiable information to register SAVE user agencies and other administration functions.

The U. S. Citizenship and Immigration Services will use the Social Security number from



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requesting agencies to query the Social Security Administration Enumeration System to assist in providing U.S. citizenship or immigration status of individuals. Federal, state, local, tribal, and territory governments generally use the SAVE Program to assist in awards of benefits, voter registration verification, as well as identifying fraud.

The U.S. Citizenship and Immigration Services will compare U.S. passport information against information available in U.S. Department of State accessed systems to verify a match or no match. Using a passport number, the SAVE Program will be able to verify acquired or derived citizenship for individuals with a U.S. passport directly from the source records. Images of the U.S. Passport document may also be submitted by agencies when applicable to be used by status verifiers as part of the verification process. This ensures that personally identifiable information contained on the document can be used to verify the document and subsequently the citizenship status of the individual. Additionally, the U.S. Citizenship and Immigration Services will use U.S. passport application information, specifically, the Certificate or Citizenship or Certificate of Naturalization, to quickly verify citizenship status in certain cases and reduce its response time to registered users.

8. How long and under which retention schedule is the information retained?

Pursuant to the National Archives and Records Administration Authority N1-566-08-07, the U.S. Citizenship and Immigration Services maintains records within the SAVE Program for ten years from the date of the completion of the verification, unless the records are part of an ongoing law enforcement investigation in which case the U.S. Citizenship and Immigration Services may retain them until completion of the investigation.

9. With whom will personally identifiable information be shared?

☐ Within the Component/Office

Specify:

☒ Other-U.S. Department of Homeland Security Component(s)/Office(s)

Specify: When potential fraud or misuse is indicated by the SAVE Program information, this information may be shared, on a case-by-case basis, with U.S. Department of Homeland Security internal law enforcement organizations to include:

- U.S. Immigration and Customs Enforcement; and
- U.S. Customs and Border Protection.



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☒ State, local, tribal, or territorial entities	Specify: A list of all requesting agencies and their purpose for accessing the SAVE Program is accessible at https://www.uscis.gov/save/save-agency-search-tool . Additionally SAVE may retrieve information from state driver's license and identification issuing agencies (such as Department of Motor Vehicles).
☐ Public	Specify:
☐ Private sector	Specify:
☐ Foreign governments	Specify:
☐ Foreign entities	Specify:
☒ Other:	Specify: Social Security Administration, U.S. Department of State, and National organizations maintaining driver's license and state identification information (such as the National Law Enforcement Telecommunications System).

10. How are individuals provided notice prior to the collection of information? If notice is not provided, explain why not.

Each registered agency completes a Memorandum of Agreement with the U.S. Citizenship and Immigration Services and agrees to provide notice to individuals within their jurisdiction of their use of information and sharing with the U.S. Citizenship and Immigration Services. Additionally, the U.S. Citizenship and Immigration Services provides notice through this Privacy Impact Assessment as well as system of records notices mentioned in Section 4. Each state holds the responsibility to provide notice of their use of information at the time of their collection or additional use of the information.

11. What opportunities are available for individuals to consent to uses, decline to provide information, or opt out?

The U.S. Citizenship and Immigration Services does not provide opportunities to individuals within the jurisdiction of the registered agency to consent to the U.S. Citizenship and Immigration Services use of their information. Pursuant to the above-mentioned legal authorities



listed in Section 3, the U. S. Citizenship and Immigration Services must provide individual information to the Social Security Administration and the U.S. Department of State to allow the Requesting Agency to determine the immigration status of applicants and registrants of benefits, licenses, or for voter registration verification. Each registered agency holds the responsibility to provide opportunities for consent of their use of individuals' information. Additionally, each registered agency holds the responsibility to determine whether an individual has a legal right to decline providing information to them based on applicable law.

12. What procedures are in place to allow individuals to correct inaccurate or erroneous information?

Individuals may request access to their information maintained by the U.S. Citizenship and Immigration Services by submitting a request at <https://www.uscis.gov/records/request-records-through-the-freedom-of-information-act-or-privacy-act>.

Requesters are required to provide their Alien Registration Number and/or full name, date, and place of birth, and return address.

Individuals should provide all written requests to contest or amend their information reviewed by the SAVE Program, with appropriate proof of identity, class of admission, and other relevant identifying information, as well as a statement about the incorrect. Depending on the originating source of information, the request may be satisfied within the U.S. Citizenship and Immigration Services, or the individual may be referred to the appropriate record holding agency. If the source of data is from a U.S. Citizenship and Immigration Services download and the SAVE Program confirms the data is incorrect, often by comparing the documents with the information in the program and cross-referencing other U.S. Citizenship and Immigration Services Verification Information System databases, the SAVE Program will contact the appropriate system owner recommending that the data be corrected.²² Alternatively, the individual may make an appointment by calling the U.S. Citizenship and Immigration Services Contact Center at 800-375-5283 (TTY 800-767-1833). When appearing for the appointment, the person should provide accompanying supporting documentation, including proof of identity, class of admission, and other relevant identifying information. The SAVE Program customer agencies may change their profile information directly within the U.S. Citizenship and Immigration

²² The Verification Information System is a composite information system incorporating data from various U.S. Department of Homeland Security and Social Security Administration databases and functions as the underlying information technology that supports the SAVE Program. The Verification Information System supports the U.S. Citizenship and Immigration Service's ability to verify whether a newly hired employee is authorized to work in the United States and the citizenship or immigration status verification of individuals seeking certain government benefits. The Verification Information System, including the services it houses, is in the Amazon Web Service cloud environment.



Services Verification Information System application. To correct typographic errors in your U.S. Citizenship and Immigration Services record or document, visit egov.uscis.gov/e-request.

13. What administrative, technical, and physical controls are used to protect the information?

The SAVE Program requires potential enrollees and customer agencies to register for participation in the program and sign an appropriate data sharing agreement. Once the enrollees submit the required documentation, all users must complete a web-based training course that explains functionality and security requirements.

The Systematic Alien Verification for Entitlements Program's internal users take the mandatory annual U.S. Department of Homeland Security Computer Security Training and the U.S. Citizenship and Immigration Services Privacy Awareness Training. Additionally, staff who administer the SAVE Program are required take special, role-based training. External SAVE Program users complete online tutorials. The tutorials also cover the procedures and policies associated with the use of the SAVE Program and includes privacy-related topics.

The Verification Information System, as the underlying technology supporting the SAVE Program has been Certified and Accredited and received a full authority to operate in April 2014. The system has been approved to participate in the Ongoing Authorization process and is continually monitored for compliance with the National Institute of Science and Technology policies to ensure compliance with the Federal Information System Management Act. The SAVE Program implements access controls for both internal and external customers, such as account names and passwords to access the program. The program has an automated mechanism to ensure that users change their passwords at specified intervals. Additionally, the program implements the following technical controls:

- Password data is encrypted within the system;
- The system is located within a multi-layered firewall architecture;
- The system follows a robust set of security controls that meet the U.S. Department of Homeland Security System Security Policy requirements. The certification and accreditation process ensures that the U.S. Citizenship and Immigration Services documents and verifies these security controls through the certification and accreditation process;
- The system uses secure hypertext transfer protocol protected communications during all data transmissions between the client workstation and the system;



- Passwords are encrypted when making database connections; and
- Procedures are in place to ensure that any potential breaches of information are reported within one hour of being found.

14. How does the Component ensure that personally identifiable information is used appropriately?

The SAVE Program has a comprehensive audit trail tracking and maintenance function that stores information about users who submit queries, when the query was processed, the query response, who received the query response, and when the user received the query response. The audit logs have restricted access based on user roles. These logs are external to system administration access methods and protected from modification. U.S. Citizen and Immigration Services personnel periodically review these audit logs to monitor user activity. Registered agencies must abide by all security requirements that they agreed to when they enrolled in the program. Attempts to evade the security controls can result in loss of access to the SAVE Program.

Some registered agencies use a single sign-on for all their individual users. In these cases, the SAVE Program will not collect information from individual users because individual users will appear as one agency user. In the case of single sign-on access to users, the U.S. Citizenship and Immigration Services requires the agency to sign an addendum to their Memorandum of Agreement which states that every user of the system must be assigned a unique identifier. If requested, the agency provides this information to the U.S. Citizenship and Immigration Services to allow for a clear audit trail for all transactions.

Associated Privacy Risks and Mitigations

Privacy Risk:	There is a risk that the U.S. Citizenship and Immigration Services may share inaccurate information with registered agencies, which could in turn impact a registered user agency's eligibility determination for an individual.
Mitigation:	The U.S. Citizenship and Immigration Services partially mitigates this risk. Generally, the SAVE Program has a 3-step process. The first step is a general query of the system. However, due to misspelling of names, transposed numbers, or incomplete information, the SAVE Program may produce inaccurate results. To mitigate this, the SAVE Program has a manual step process where a U.S. Citizenship and Immigration Services staff member will try to reconcile the request manually. The third step is for



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	the U.S. Citizenship and Immigration Services to get additional documentation from the registered agency. However, this only partially mitigates the risk since the new request using Social Security numbers does not allow for a second and third step review. The U.S. Citizenship and Immigration Services does not have direct access to the Social Security Administration system to support these additional steps. Additionally, registered agencies may not go through all steps to ensure accuracy of information.
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Privacy Risk:	There is a risk that all United States citizens, including natural born U.S. citizens, have not been provided notice that the SAVE Program collects or maintains their information for citizenship and immigration status.
Mitigation:	The United States Citizenship and Immigration Services partially mitigates this risk. It is the responsibility of each registered agency to provide notice to individuals within their jurisdiction of their use of information and sharing with the U.S. Department of Homeland Security/U.S. Citizenship and Immigration Services. The U.S. Citizenship and Immigration Services is publishing this privacy impact assessment and related System of Records Notice to provide transparency regarding the new categories of information collected and shared to assist registered agencies in verifying citizenship and immigration status of individuals applying for a benefit or license and voter registration verification. The SAVE Program's "Register an Agency for SAVE" explains how an eligible agency can create a Memorandum of Agreement with the U.S. Citizenship and Immigration Services. These agreements require registered user agencies to comply with the Privacy Act of 1974, 5 U.S.C. § 552a, as amended, and other applicable laws, regulations, and policies. These policies include transparency and notice to individuals regarding agencies collection and use of personally identifiable information.

Privacy Risk:	There is a risk that the U.S. Citizenship and Immigration Services may use the information it obtains from registered agencies, the Social Security Administration, and the U.S. Department of State, for purposes not authorized by statute or for which it was originally collected.
Mitigation:	The United States Citizenship and Immigration Services mitigates this risk by only collecting information as authorized by the Immigration and Naturalization Act and other authorities mentioned within this Privacy



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	Impact Assessment. The purpose for sharing Social Security numbers with the Social Security Administration and receiving information is to allow user agencies to verify the citizenship or immigration status of individuals applying for a benefit, license, or voter registration verification. The purpose for sharing and receiving U.S. passport information with the U.S. Department of State is to verify the citizenship or immigration status of individuals applying for a benefit, license or for voter registration verification. Also, each registered agency must execute a Memorandum of Agreement or Computer Matching Agreement with the U.S. Citizenship and Immigration Services that includes terms that the SAVE Program will be used in accordance with the law.
Privacy Risk:	There is a risk that the new category individuals covered by this assessment/notice, specifically, United States born citizens do not have the opportunity to individually participate or consent in how the U.S. Citizenship and Immigration Services uses their information.
Mitigation:	The U.S. Citizenship and Immigration Services cannot mitigate this risk. Each user agency is responsible for complying with federal and local authorities. The U.S. Citizenship and Immigration Services assumes that each user agency factors in the principles of notice, individual participation, and consent prior to providing information to the U.S. Citizenship and Immigration Services. The U.S. Citizenship and Immigration Services only uses the information for the authorized purpose(s) identified within this Privacy Impact Assessment. Individuals should consult their local government agencies to determine the appropriate opt-in or opt-out statute, regulations and policies.
Privacy Risk:	There is a risk that individuals may access the SAVE Program that do not have a need to know of the information.
Mitigation:	The U.S. Citizenship and Immigration Services mitigates this risk by requiring the SAVE Program's potential enrollees and customer agencies to register for participation in the program and sign a Memorandum of Agreement or Computer Matching Agreement. After all required documentation is submitted, all users must complete a web-based training course that explains functionality and security requirements. The SAVE Program's internal users complete the mandatory annual privacy



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and information technology training. External program complete take on-line tutorials explaining the program. The tutorials also cover the procedures and policies associated with the use of the program.

Contact Official

Brian Broderick
Division Chief (Acting)
Verification Division
U.S. Citizenship and Immigration Services

Responsible Official

Angela Y. Washington
Component Privacy Officer
Office of Privacy
U.S. Citizenship and Immigration Services
U.S. Department of Homeland Security
USCIS.PrivacyCompliance@uscis.dhs.gov

Approval Notice:

By signing below, the U.S. Department of Homeland Security Chief Privacy Officer approves this Privacy Impact Assessment for the SAVE Program. If, however, during the operational course of this program or U.S. Citizenship and Immigration Services' use of this technology changes from what has been documented or the U.S. Department of Homeland Security Privacy Office becomes aware of evidentiary changes to the intended use of the personally identifiable information or the scope of the personally identifiable information collected, of the program or technology is determined to be ineffective, the Chief Privacy Officer reserves the right to revoke approval of this Privacy Impact Assessment.

Approval Signature

Original, signed copy on file with the U.S. Department of Homeland Security Privacy Office.

Roman Jankowski
Chief Privacy Officer
U.S. Department of Homeland Security
Privacy@hq.dhs.gov



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PRIVACY THRESHOLD ANALYSIS (PTA)

This form serves as the official determination to identify the privacy compliance requirements for all Departmental uses of personally identifiable information (PII).

A Privacy Threshold Analysis (PTA) serves as the document used to identify information technology (IT) systems, information collections/forms, technologies, rulemakings, programs, information sharing arrangements, or pilot projects that involve PII and other activities that otherwise impact the privacy of individuals, and to assess whether there is a need for additional privacy compliance documentation or requirements. A PTA includes a general description of the IT system, information collection, form, technology, rulemaking, program, pilot project, information sharing arrangement, or other Department activity and describes what PII is collected (and from whom) and how that information is used. In accordance with the Fair Information Practice Principles (FIPPs),¹ Component Privacy Officers should consider best practices for privacy safeguards and principles when reviewing and adjudicating PTAs.

Please complete the attached PTA and submit it to your Component Privacy Office. If you do not have a Component Privacy Office, please send the PTA to the DHS Privacy Office:

Senior Director, Privacy Compliance
The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528

The Component or DHS Privacy Office will review this form and assess whether any privacy compliance documentation is required. If privacy compliance documentation is required – such as Privacy Impact Assessment (PIA), System of Records Notice (SORN), Privacy Act Statement/Privacy Notice, or Computer Matching Agreement (CMA) – the Component Privacy Office will send you a copy of the relevant compliance template to complete and return.

¹ See [The Fair Information Practice Principles](#) | Homeland Security.



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PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Project, Program, or System Name:	Systematic Alien Verification for Entitlements Program		
Component or Office:	U.S. Citizenship and Immigration Services (USCIS)	Office or Program:	Verification Division
FISMA Name (if applicable):	Verification Information System	FISMA Number (if applicable):	CIS-06285-MAJ-06285
Type of Project or Program:	System	Project or program status:	Operational
Date first developed:	July 7, 2007	Pilot launch date:	N/A
Date of last PTA update	February 7, 2023	Pilot end date:	N/A
ATO Status (if applicable):²	Complete	Expected ATO/ATP/OA date (if applicable):	Ongoing Authorization

PROJECT, PROGRAM, OR SYSTEM MANAGER

Name:	Irina Sidelnikov		
Office:	Office of Information Technology	Title:	OIT Project Manager
Phone:	[REDACTED]	Email:	[REDACTED]

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name:	Minh Vo		
Phone:	N/A	Email:	[REDACTED]

² The DHS OCIO has implemented a streamlined approach to authorizing an Authority to Operate (ATO), allowing for rapid deployment of new IT systems and initiate using the latest technologies as quickly as possible. This approach is used for selected information systems that meet the required eligibility criteria in order to be operational and connect to the network. For more information, see <https://dhsconnect.dhs.gov/org/comp/mgmt/ocio/ciso/Documents/DHS%20ATP%20Guide%20v2.0.pdf#search=atp>.



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SPECIFIC PTA QUESTIONS

1. Reason for submitting the PTA: Updated PTA

The United States Citizenship and Immigration Services submits this updated Privacy Threshold Analysis to document the United States Citizenship and Immigration Services Verification Division and Office of Technology changes to the Systematic Alien Verification for Entitlements Program. The United States Citizenship and Immigration Services administers the Systematic Alien Verification for Entitlements Program, an inter-governmental initiative that provides a web-based service to help federal, state, territorial, tribal and local agencies and other governmental entities verify United States citizenship or immigration status/category information of applicants for benefits, licenses, or other authorized purposes.

This Privacy Threshold Analysis documents that the Systematic Alien Verification for Entitlements Program has

1. Expanded its search capabilities to allow approved Systematic Alien Verification for Entitlements Program user agencies to verify United States citizenship information using Social Security Numbers and other non-Department of Homeland Security enumerators.
2. A new Social Security Administration system connection to support verification of citizenship/immigration status.
3. A new bulk uploader/list processor function that allows user agencies to upload lists of benefit applicants.
4. Use of the Voter Registration and Voter List Maintenance Verification functionality.
5. The collection of information from the Department of State's Consular Consolidated Database/American Citizen Record Query system. Additionally, the Systematic Alien Verification for Entitlements Program will integrate with the Customs and Border Protection TECS (not an acronym) - Travel Documents and Encounter Data system.

2025 Updates

On April 22, 2025, Homeland Security Secretary Kristi Noem, alongside the United States Citizenship and Immigration Services and the Department of Government Efficiency, announced a comprehensive optimization of the Systematic Alien Verification for Entitlements Program to ensure a single, reliable source for verifying immigration status and United States citizenship nationwide. Congressional, federal, and state stakeholders have periodically expressed interest in using the Systematic Alien Verification for Entitlements to verify naturalized and derived citizenship information during voter registration and/or for voter list maintenance. Verification for voter list maintenance purposes often occurs when a state Department of Motor Vehicles compares its records to state voter agency records to determine if individuals on the voter rolls represented that they were other than U.S. citizens when the Department of Motor Vehicles issued their driver's license. The state voter agency then follows up with those individuals as to their citizenship status through state law voter registration challenge procedures. The United States Citizenship and Immigration Services Verification Division is leading this effort and has identified multiple phases to optimize the program. A high-level summary is provided below, while a more detailed description of each phase follows.



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- Phase 1: Free Service for State, Local, Tribal, Territory agencies and Bulk Uploader. (Estimated completion: Implemented)
- Phase 2: Integration with the Social Security Administration to allow for full Social Security Number to be used as a non-Department of Homeland Security enumerator. (Estimated completion: Implemented)
- Phase 3: Modify the Security Administration integration to allow for truncated Social Security Numbers (last 4-digits) to be used as a non-Department of Homeland Security enumerator. (Estimated completion: July/August 2025)
- Phase 4: Integration with Customs and Border Protection to enable United States passport data, received from the Department of State, to be used within the Systematic Alien Verification for Entitlements Program. (Estimated completion: To be determined)
- Phase 5: Integration with the Department of Justice to enable an incarceration/felony related flag (the flag will be used internally and will not be sent to the agencies or the applicants). (Estimated completion: To be determined)
- Phase 6: Integration with State Driver's Licensing Agencies to enable a Driver License number to be used as a non-Department of Homeland Security enumerator. (Estimated completion: To be determined)

The summary below focuses on phases one (1) through four (4). More detailed information can be found later in this document. Phases five (5) and six (6) are longer term goals of the optimization effort and are still in the exploratory/planning stage. The United States Citizenship and Immigration Services will update this Privacy Threshold Analysis to support the remaining phases during their development.

Phases One (1) through Three (3)

Systematic Alien Verification for Entitlements Program eliminated fees for non-federal users creating Systematic Alien Verification for Entitlements Program cases. User agencies can now create multiple individual cases from a list of data provided by the user. Further, the Systematic Alien Verification for Entitlements Program plans to integrate additional immigration information into search functionality and case results, such as timelines and addresses. Improved automatic status updates and a new user-friendly interface will empower federal, state, local, territorial, and tribal agencies to help prevent individuals who are not qualified for government benefits and licenses from receiving those benefits and licenses. The Department of Homeland Security intends to provide ongoing updates to stakeholders as the Systematic Alien Verification for Entitlements Program Optimization Plan progresses. Systematic Alien Verification for Entitlements Program users must attest to completing the Systematic Alien Verification for Entitlements Program tutorial prior to gaining access to Systematic Alien Verification for Entitlements Program. Users' access is based on their permissions.

The United States Citizenship and Immigration Services has developed and implemented a new bulk uploader/list processor feature to the Systematic Alien Verification for Entitlements Program. This feature will allow program users to upload a list (such as an excel spreadsheet) of benefit applicants to the Systematic Alien Verification for Entitlements Program for processing. Once the list is uploaded, the Systematic Alien Verification for Entitlements Program will accept or not accept the data then, through an automated process, create front-end single-record cases for each entry. Initially the creation of cases using this feature is limited to cases created using an A-number, Citizenship or Naturalization Certificate



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number, or Social Security number. Agencies will not be prompted to institute additional verification when using this process but are instructed to resubmit additional information when the process is unable to return a response. Expansion of this feature in the future may include the ability to create cases with additional enumerators and the ability to request configured information not automatically selected for the benefit type.

User agencies will be able to access each case created using the list processor feature in the Systematic Alien Verification for Entitlements system as normal, by viewing the individual case status and response. The Systematic Alien Verification for Entitlements Program also has a feature available to all the user agencies to generate a report that will list all the cases created, the status of the case and the Systematic Alien Verification for Entitlements Program response. Access to generate the report, including what cases are included, will vary depending upon the individual user's permission. United States Citizenship and Immigration Services is providing this verification service for all benefit requests. There are approximately 1,200 user agencies with access to the Systematic Alien Verification for Entitlements Program to verify immigration status for benefits or entitlements, and in fiscal year 2024, the Systematic Alien Verification for Entitlements Program completed over 24.5 million first step verifications.

The Systematic Alien Verification for Entitlements Program was originally designed only to use a Department of Homeland Security-issued enumerator (such as an alien number or A-Number) to query immigration records, specifically, to provide immigration status to Systematic Alien Verification for Entitlements Program user agencies. The Systematic Alien Verification for Entitlements Program is now expanding to allow Systematic Alien Verification for Entitlements Program user agencies to provide a Social Security Number or a United States Passport number to query the Systematic Alien Verification for Entitlements Program.

The Systematic Alien Verification for Entitlements Program will also add the ability for user agencies to verify truncated Social Security Numbers (last 4 digits) against Social Security Administration records. This will allow the Systematic Alien Verification for Entitlements Program to verify all United States citizens including those by birth, which was previously not available. A benefit applicant's Social Security number can only be used for automated initial verification and cannot be used for additional verification, which will continue to require a Department of Homeland Security immigration enumerator since the Systematic Alien Verification for Entitlements Program does not normally collect Social Security Numbers or passport numbers. The addition of the Voter Registration and Voter List Maintenance Verification, and the Social Security Administration connection is now live. The Systematic Alien Verification for Entitlements Program can now verify United States-born citizens for voter verification agencies.

The Department of Homeland Security/United States Citizenship and Immigration Services seeks access to Social Security Administration information accessed through the Department of Homeland Security/United States Citizenship and Immigration Services Verification Information System³. The United States Citizenship and Immigration Services and the Social Security Administration agreed to the following limitations on the access to, and disclosure and use of information that identifies a verification request as being generated by United States Citizenship and Immigration Services or associated with a United States Citizenship and Immigration Services program:

³ Verification Information System provides services to customers through Systematic Alien Verification for Entitlements and E-Verify (the latter of which will not be used for this initiative).



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- Data or information that identifies a verification request as being generated by United States Citizenship and Immigration Services or associated with a United States Citizenship and Immigration Services program will remain information owned by United States Citizenship and Immigration Services.
- The United States Citizenship and Immigration Services will use the verification responses generated by the Social Security Administration only for the purposes described in the Information Sharing Agreement between the Department of Homeland Security, United States Citizenship and Immigration Services and the Social Security Administration.
- Data or information that identifies a verification request as being generated by the United States Citizenship and Immigration Services or associated with a United States Citizenship and Immigration Services program will be used only as provided in the Information Sharing Agreement by the Social Security Administration.
- Data or information that identifies a verification request as being generated by United States Citizenship and Immigration Services or associated with the United States Citizenship and Immigration Services program provided by Social Security Administration will not be duplicated or disseminated outside Social Security Administration without prior written approval from United States Citizenship and Immigration Services. The United States Citizenship and Immigration Services will not give such approval unless the redisclosure is required by law or is essential to the conduct of the exchange. In such cases, the Social Security Administration, the agency redisclosing the records, must specify in writing what records will be redisclosed, to whom they will be redisclosed, and the reasons that justify redisclosure.
- The United States Citizenship and Immigration Services will not duplicate or disseminate the verification responses for a purpose not covered by the Information Sharing Agreement, within or outside of its agency, without the written permission of the Social Security Administration excepted as required by Federal law. The Social Security Administration will not give such permission, unless Federal law requires disclosure, or disclosure is essential to the purpose of this Agreement. For such permission, The United States Citizenship and Immigration Services must specify in writing what data it is requesting to duplicate or disseminate and to whom, and the reasons that justify such duplication or dissemination.

Administrative Safeguards

The Social Security Administration and the United States Citizenship and Immigration Services will restrict access to the data matched and to any data created by the match to only those users, for example, employees and contractors, who need it to perform their official duties in connection with the uses of the data authorized in the Information Sharing agreement. Further, the Social Security Administration and the United States Citizenship and Immigration Services will advise all personnel with access about the confidential nature of the data, the safeguards required to protect the data, and the civil and criminal sanctions for noncompliance contained in the applicable Federal laws.

Parties, including all personnel with access to information, will be appropriately educated and trained regarding the proper handling of personally identifiable information and proper care of the information systems to ensure the overall safeguarding and security of the information. The Social Security Administration and the United States Citizenship and Immigration Services will ensure that its



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employees, including contractors with the access to any of the information, have completed privacy training on the handling of personally identifiable information.

Phase Four (4)

The United States Citizenship and Immigration Services will need to query other non-United States Citizenship and Immigration Services systems, besides the Social Security Administration's Numident system, with the information provided by the Systematic Alien Verification for Entitlements Program user agency to find the appropriate Department of Homeland Security-issued enumerator to continue with the Systematic Alien Verification for Entitlements Program case processing. For instance, USCIS is researching the possibility of using a United States Passport Number to be able to identify a Department of Homeland Security-issued enumerator. In a case when a User Agency uploads or enters a United States Passport Number instead of a DHS-issued enumerator, the Systematic Alien Verification for Entitlements Program will query another non-United States Citizenship and Immigration Services System using the United States Passport Number along with a unique identifier to find any records and will identify if a Department of Homeland Security-issued enumerator was used by the applicant when applying for a Department of Homeland Security-issued benefit or if a Passport Number was used at a United States Port of Entry and is associated with a Department of Homeland Security-issued enumerator. In this instance, to enable this change, the Systematic Alien Verification for Entitlements Program would integrate with the Customs and Border Protection TECS (not an acronym) - Travel Documents and Encounter Data to match a Passport Number against Customs and Border Protection and Department of State records to attempt to locate a Department of Homeland Security issued enumerator.

The TECS (not an acronym) - Travel Documents and Encounter Data stores travel document information (scanned images of documents, biographic information, document details, and photographs) from the United States Citizenship and Immigration Services Lawful Permanent Resident Cards along with Department of State-issued United States passports, visas, foreign passports, enhanced driver's licenses, and enhanced tribal cards. The TECS (not an acronym) - Travel Documents and Encounter Data USPassportRESTService allows interconnected systems to query TECS (not an acronym) - Travel Documents and Encounter Data for United States passport information. For this use case, the Systematic Alien Verification for Entitlements Program user agency will input a passport number into the Systematic Alien Verification for Entitlements Program. The query will trigger the USPassportRESTService to locate the matching United States passport number and return the results to the user. This will allow the Systematic Alien Verification for Entitlements Program to verify all types of United States citizens, including those by birth, which was previously not available. Currently, the Systematic Alien Verification for Entitlements Program only collects passport numbers for foreign issued passports if it is provided with an additional Department of Homeland Security enumerator. The United States Citizenship and Immigration Services E-Verify has an existing connection to the USPassportRESTService, which also resides within the Verification Information System, like Systematic Alien Verification for Entitlements Program.

The following are updates that were planned prior to Secretary Noem's vision for optimizing the Systematic Alien Verification for Entitlements Program and are still in progress.



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- Systematic Alien Verification for Entitlements Program will update the responses provided to users as part of the Interface Control Agreement Version 38, which enhances the Systematic Alien Verification for Entitlements Program query logic to provide more accurate information based on the need to know. The Systematic Alien Verification for Entitlements Program will add the collection of an uploaded document such as a Naturalization/Citizenship Certificate Number, when the user submits a second step additional verification, as well as the collection of a reason code, which allows the Systematic Alien Verification for Entitlements Program users to provide additional details regarding the applicant's request, particularly during the additional verification process. The Systematic Alien Verification Entitlements responds to users by providing an immigration status/category or United States citizenship. These additional collections will help Systematic Alien Verification for Entitlements Program identify and remedy data issues, reduce overall manual response times, and allow the Systematic Alien Verification for Entitlements Program to improve the quality of first step automated responses.
- A live site environment will be implemented where Systematic Alien Verification for Entitlements web service users can access new and current interface control agreements. This will streamline the process to update the interface control agreements and ensure that the Systematic Alien Verification for Entitlements Program users have access to the most current information for the Interface Control Agreement Version 38.
- The Systematic Alien Verification for Entitlements Program case response screen will be redesigned so that it is easier to read and allow for the additional information to be submitted. The screen will be packaged in a new way to provide the user clear information during the initial verification.

Additionally, Systematic Alien Verification for Entitlements Program will be collecting information from the Department of State's Consular Consolidated Database / American Citizen Record Query system which is a consular search engine used by the Department of State to manage and access records related to United States citizens, particularly for consular protection and services, including managing passport requests and applications.

2024 Update

As part of the Systematic Alien Verification for Entitlements Program's normal review process, the United States Citizenship and Immigration Services intends to access the Department of State's Consular Consolidated Database / American Citizen Record Query system to verify immigration status of applicants for benefits, licenses, and other authorized purposes. The purpose of collecting this information is to confirm the identity of the applicant to determine their status. This process is part of an ongoing effort that began in 2024.

Background

The Systematic Alien Verification for Entitlements Program is an online service for registered federal, state, territorial, tribal, and local government agencies to verify immigration status and United States citizenship of applicants seeking benefits or licenses. Systematic Alien Verification for Entitlements



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Program is not a database but queries Department of Homeland Security-accessed federal records to provide registered user agencies with a verification response.

In 1986, Congress mandated that the Immigration and Naturalization Service, now United States Citizenship and Immigration Services, establish a system to verify the citizenship and immigration status of individuals seeking government benefits and licenses.

The United States Citizenship and Immigration Services Verification Division administers the Systematic Alien Verification for Entitlements Program, which is an intergovernmental initiative using a web-based service to help federal, state, territorial, tribal and local benefit-issuing and licensing agencies and other governmental entities determine the immigration status or United States citizenship of applicants for public benefits, licenses, grants, credentials, background investigations, and other lawful purposes, so only entitled applicants receive them. Systematic Alien Verification for Entitlements Program verifies immigration status/category and United States citizenship against Department of Homeland Security-accessed records. Historically, the Systematic Alien Verification for Entitlements Program has not verified information for United States born citizens as a Department of Homeland Security immigration enumerator was previously required, but now the Systematic Alien Verification for Entitlements Program can verify United States-born United States citizens against Social Security Administration data. The Systematic Alien Verification for Entitlements Program does not determine an applicant's eligibility for a specific benefit or license, as this is the responsibility of the benefit/license granting agency.

As of April 1, 2025, the Systematic Alien Verification for Entitlements Program has revised its transaction charges for all state, local, tribal, and territorial government agencies using the Systematic Alien Verification for Entitlements Program to eliminate those charges. Federal agencies are still charged a fee to use the Systematic Alien Verification for Entitlements Program. The authority for the Systematic Alien Verification for Entitlements Program, and for particular Systematic Alien Verification for Entitlements Program authorized uses can be found in the Immigration Reform and Control Act⁴; the Personal Responsibility and Work Opportunity Reconciliation Act⁵ Title IV, Subtitle A, of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996⁶, and the REAL ID Act of 2005⁷, the Patient Protection and Affordable Care Act of 2010,⁸ and the Federal Aviation Administration Extension, Safety and Security Act of 2016.⁹ In addition, the Systematic Alien Verification for Entitlements Program has an obligation under 8 U.S.C. 1373(c) to "respond to an inquiry by a Federal, State or local government agency, seeking to verify or ascertain the citizenship or immigration status of any individual within the jurisdiction of the agency for any purpose authorized by law, by providing the requested verification or status information."

⁴ Immigration Reform and Control Act of 1986, Public Law No. 99-603

⁵ Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Public Law No. 104-193, 110 Statute 2168

⁶ Title IV, Subtitle A, of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 Public Law 104-208, 110 Statute 3009

⁷ REAL ID Act of 2005, Public Law No. 109-13, 119 Statute 231

⁸ Patient Protection and Affordable Care Act of 2010, Public Law No. 111-148

⁹ Federal Aviation Administration Extension, Safety and Security Act of 2016 (Federal Aviation Administration Act), Public Law No. 114-190 § 3405(d) (July 15, 2016).



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The United States Citizenship and Immigration Services Verification Division operates the Verification Data Information System as the search engine for Systematic Alien Verification for Entitlements Program and the E-Verify Program. The Verification Data Information System accesses nationally accessible databases of selected immigration records to support both the Systematic Alien Verification for Entitlements Program and the E-Verify Program. The Systematic Alien Verification for Entitlements Program queries an individual's immigration status to help the administering agency determine eligibility for any public benefit, license, or credential based on their United States citizenship or immigration status. The United States Citizenship and Immigration Services is obligated by law to respond to an inquiry by a Federal, state or local government agency, seeking to verify or ascertain the citizenship or immigration status of any individual within the jurisdiction of the agency for any purpose authorized by law, by providing the requested verification or status information.

Systematic Alien Verification for Entitlements Program

The United States Citizenship and Immigration Services administers the Systematic Alien Verification for Entitlements Program, an inter-governmental initiative that provides a web-based service to help federal, state, territorial, tribal, and local benefits-issuing and licensing agencies and other governmental entities along with Airport Operators verify the United States citizenship and immigration status/category information of applicants for public benefits or licenses (hereinafter "benefits"). Examples of these benefits include Supplemental Security Income Supplemental Nutrition Assistance Program (formerly food stamps), Temporary Assistance for Needy Families cash assistance, Medicaid, Children's Health Insurance Program, REAL ID compliance, and other statutorily authorized purposes, including voter verification.

The Systematic Alien Verification for Entitlements Program also eliminates fees for database searches, breaks down silos for more accurate results, streamlines List Processor submission, and integrates additional immigration information, such as timelines and addresses. Automatic status updates and a new user-friendly interface will empower Federal, state, local, territorial, and tribal agencies to help prevent individuals who are not qualified for government benefits from receiving those benefits. The Department of Homeland Security intends to provide ongoing updates to stakeholders as the Systematic Alien Verification for Entitlements Program Optimization Plan progresses.

Agency use of the Systematic Alien Verification for Entitlements Program is administered by the Verification Division. All user agencies are required to register with the Systematic Alien Verification for Entitlements Program to access the system prior to using the Systematic Alien Verification for Entitlements Program. The Systematic Alien Verification for Entitlements Program is not a source system and connects with federal immigration systems, and now the Social Security Administration's Numident¹⁰ system, to access applicable information. The Systematic Alien Verification for Entitlements Program also has a Case Status Check capability that allows benefit applicants to view the status of their Systematic Alien Verification for Entitlements Program case. The system provides benefit eligibility checks based on the grant dates. The Verification Division has a three (3) tier process when verifying an individual's immigration status or United States citizenship.

¹⁰ NUMIDENT or "Numerical Identification" refers to the master file of Social Security Administration records containing information about individuals who have applied for or been assigned a Social Security Number. This file includes records for applications, claims, and death records related to individuals with a Social Security Number.



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Users must perform all additional verification procedures the Systematic Alien Verification for Entitlements Program requires and/or the applicant requests prior to denying a benefit based upon a Systematic Alien Verification for Entitlements Program response. Users must provide all applicants who are denied benefits based solely or in part upon the Systematic Alien Verification for Entitlements Program response adequate written notice and the information necessary to contact the Department of Homeland Security so that applicants may correct their immigration records in a timely manner, if necessary.

Initial verification

A Systematic Alien Verification for Entitlements Program user agency accesses their account in the system and either submits requests individually or via a bulk request using the system's new bulk uploader feature. When a Systematic Alien Verification for Entitlements Program user agency submits an online verification request for a benefit applicant, it provides several required identifiers for the benefit applicant from documents presented by the benefit applicant, including first and last name, date of birth, and at least one of the following: an enumerator from the Department of Homeland Security (e.g. Alien number/United States Citizenship and Immigration Services number, Form I-94 Number, Card Number/I-797 Receipt number, Citizenship/Naturalization Certificate Numbers), a Social Security number from Social Security Administration, or a United States passport number from the Department of State. Social Security Numbers and United States passport numbers are new enumerators. Previously, enumerators were solely limited to Department of Homeland Security-issued immigration enumerators.

In the case of a bulk upload the Systematic Alien Verification for Entitlements Program will use an automated process to create individual cases for each benefit applicant on the list.

Using these data fields, the Systematic Alien Verification for Entitlements Program performs an automated query of various Systematic Alien Verification for Entitlements Program-accessed federal databases for relevant records. If a Social Security Number is submitted under this new collection, the Systematic Alien Verification for Entitlements Program will verify this enumerator against the Social Security Administration records, including the Social Security Administration death records and citizenship records. If the individual's Social Security account has a record of an A-number or certificate number, the Social Security Administration will provide that information to the Systematic Alien Verification for Entitlements Program, which will be used to validate that information against the Department of Homeland Security records. If a United States passport number is submitted, the Systematic Alien Verification for Entitlements Program will verify it against the Department of State related records available in the Customs and Border Protection TECS (not an acronym) - Travel Documents and Encounter Data system. When the Systematic Alien Verification for Entitlements Program locates a record pertaining to the benefit applicant in any of these federal databases, the Systematic Alien Verification for Entitlements Program displays a verification response to the user agency within seconds.

Second step, additional verification (Tier 2)



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If the Systematic Alien Verification for Entitlements Program is unable to find a record pertaining to the benefit applicant through the automated first level search of the Department of Homeland Security records, including United States passport records and the Social Security Administration records, it displays a response to the user indicating additional action is required from the user agency, including requesting additional verification when an immigration enumerator is available. If only a Social Security Number is submitted for verification, the user agency will be informed to close the case and submit a new request using either corrected data or an immigration enumerator, since additional verification cannot be conducted with only a Social Security Number.

The Systematic Alien Verification for Entitlements Program user agency may start the additional verification procedure, which may include is an in-depth manual review by Systematic Alien Verification for Entitlements Program staff (Status Verification Analyst) to determine the applicant's immigration status or United States citizenship. At the point at which the "Institute Additional Verification" message is displayed, user agencies must submit the case for additional verification if they are relying on a Systematic Alien Verification for Entitlements Program response to deny a benefit. Additionally, if the user agency receives a response and they have questions about the validity of the response, the user agency may submit a case that already received a Systematic Alien Verification for Entitlements Program response for additional verification. Users must also submit a case for additional verification when requested by the applicant.

User agencies may not rely on a Systematic Alien Verification for Entitlements Program response to approve or deny an application for benefits unless they have followed all required Systematic Alien Verification for Entitlements Program verification procedures. The Systematic Alien Verification for Entitlements Program users are not required to institute additional verification if a user agency has alternate grounds upon which to base its decision to decide a benefit that do not require verification of the applicant's immigration status/category, even where the agency is prompted to do so. Examples of when a user agency has alternate grounds to base a decision that does not require the completion of additional verification include:

- The applicant does not meet eligibility requirements for the benefit unrelated to immigration status/United States citizenship.
- The applicant withdraws their application.
- The applicant cannot be contacted/fails to respond to an agency's request for follow-up.
- The applicant presents documentation the Systematic Alien Verification for Entitlements Program cannot verify (such as a military identification).

This revision adds the collection of an uploaded document which includes immigration enumerators (such as a Form I-94, Arrival/Departure Records, Naturalization/Citizenship Certificate, or passport records) when a case is submitted for second step additional verification as well as a reason code. Reason codes can provide information on why the initial verification was not successful, if the case has been escalated for additional verification, or suggest that additional verification steps may be needed to determine the applicant's status or eligibility for a benefit. Reason codes can also identify if it was a user-initiated additional verification request when the user received an initial Systematic Alien Verification for Entitlements Program response providing an immigration status/category or United States citizenship. These additional collections will help the Systematic Alien Verification for Entitlements Program identify



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and remedy data issues, reduce overall manual response times, and allow the Systematic Alien Verification for Entitlements Program to improve the quality of first step automated responses.

If the second step manual search produces relevant information enabling the verification of immigration status, the Systematic Alien Verification for Entitlements Program provides an electronic response to the inquiring user agency.

If the user agency declines second step additional verification, the verification process ceases. Additional screens notify the user agency that closing the case without performing additional verification means the agency does not have a complete Systematic Alien Verification for Entitlements Program response. The Systematic Alien Verification for Entitlements Program user agencies cannot rely upon an incomplete Systematic Alien Verification for Entitlements Program response to deny a benefit.

Third step Additional Verification with Documents (Tier 3)

If a benefit applicant's immigration status/category cannot be verified on initial or additional verification step when submitting a Department of Homeland Security enumerator, the system will prompt the user agency to resubmit the case with documents. When the prompt is received, the agency must upload a copy of the front and back of the immigration document the applicant presented to the user agency for the Systematic Alien Verification for Entitlements Program to perform detailed manual research at third step. A Department of Homeland Security immigration enumerator is required for the third step additional verification. The Systematic Alien Verification for Entitlements Program cannot complete third step additional verification using non-immigration documentation. The Systematic Alien Verification for Entitlements Program user agencies are legally authorized to make electronic copies of immigration documents for purposes of verifying immigration status. Cases created with just the Social Security Number or a Passport Number as the enumerator are not subject to this step.

If the third step manual review produces relevant information enabling the verification of immigration status/category or United States citizenship, the Systematic Alien Verification for Entitlements Program provides an electronic response to the user agency.

If a benefit applicant's immigration status/category is not verified after completing third step verification, the Systematic Alien Verification for Entitlements Program will provide additional information or guidance on how to proceed.

If the applicant believes their information in the Department of Homeland Security records is incorrect, the applicant can seek a records correction. User agencies should provide the Systematic Alien Verification for Entitlements Program Fact Sheet and Systematic Alien Verification for Entitlements Program Records: Fast Facts for Benefit Applicants¹¹ to benefit applicants that may require records correction.

¹¹ The Systematic Alien Verification for Entitlements Fact Sheet and Systematic Alien Verification for Entitlements Records: Fast Fact for Benefits Applicants is accessible at <https://www.uscis.gov/save/benefit-and-license-applicants/resources-for-benefit-and-license-applicants>



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The Systematic Alien Verification for Entitlements Program user agency continues to have the option of running a web report within the system that will create a file in Adobe format of all cases processed for their organization. The United States Citizenship and Immigration Services provides access to relevant reports of approved or pending cases for Systematic Alien Verification for Entitlements Program user agencies to assist them in managing their Systematic Alien Verification for Entitlements Program cases and monitoring their own compliance with the Systematic Alien Verification for Entitlements Program rules and the federal deeming and reimbursement rules. User agencies can 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, unexpired foreign passport number, I-94 Arrival/Departure Record), and immigration status, only if the benefit was administered.

Voter Registration and Voter List Maintenance Verification

The Illegal Immigration Reform and Immigrant Responsibility Act of 1996 expanded the Systematic Alien Verification for Entitlements Program by requiring the program to respond to inquiries by federal, state and local government agencies seeking to verify or determine the citizenship or immigration status of any individual within the jurisdiction of the agency for any lawful purpose. See 8 U.S.C. § 1373(c). This authority allows agencies to use the Systematic Alien Verification for Entitlements Program for verification of citizenship and immigration status outside of the traditional benefit-granting programs covered by the Immigration Reform and Control Act of 1986. This includes voter registration and voter list maintenance purposes, so long as the agency meets the legal requirements for using the Systematic Alien Verification for Entitlements Program and provides the required applicant information, when submitting verification requests.

On January 20, 2025, and March 25, 2025, the President issued Executive Orders 14159, *Protecting the American People Against Invasion*¹² and 14248, *Preserving and Protecting the Integrity of American Elections*¹³ respectively. Executive Order 14159 requires the Secretary to “promptly issue guidance to ensure maximum compliance by [Department of Homeland Security] personnel with the provisions of 8 U.S.C. 1373¹⁴ and 8 U.S.C. 1644¹⁵ and ensure that State and local governments are provided with the information necessary to fulfill law enforcement, citizenship, or immigration status verification requirements authorized by law.” Executive Order 14248¹⁶ provides, “Federal laws, such as the National Voter Registration Act (Pub. L. 103-31) and the Help America Vote Act (Pub. L. 107-252), require States to maintain an accurate and current Statewide list of every legally registered voter in the State. Pursuant to the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, Department of Homeland Security/United States Citizenship and Immigration Services is required to share database information with States upon request so they can fulfill this duty. 8 U.S.C. 1373(c)¹⁷.” Executive Order 14159¹⁸ directs the Secretary to “ensure that State and local officials have, without the requirement of the payment

¹² <https://www.federalregister.gov/documents/2025/01/29/2025-02006/protecting-the-american-people-against-invasion>

¹³ <https://www.federalregister.gov/documents/2025/03/28/2025-05523/preserving-and-protecting-the-integrity-of-american-elections>

¹⁴ 8 USC 1373 Communication between government agencies and the Immigration and Naturalization Service

¹⁵ 8 USC 1644 Communication between State and local government agencies and Immigration and Naturalization Service

¹⁶ Executive Order 14248 Preserving and Protecting the Integrity of American Elections

¹⁷ 8 USC. 1373(c) Obligation to respond to inquiries

¹⁸ Executive Order 14159 Protecting the American People Against Invasion



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of a fee, access to appropriate systems for verifying the citizenship or immigration status of individuals registering to vote or who are already registered.” The Secretary is also required under Executive Order 14159, in coordination with the Department of Government Efficiency Administrator, to review each State’s publicly available voter registration list and available records concerning voter list maintenance activities as required by 52 U.S.C. 20507¹⁹, alongside Federal immigration databases and State records requested, including through subpoena where necessary and authorized by law, for consistency with Federal requirements. To support this activity the Attorney General is required to prioritize enforcement of 18 U.S.C. 611²⁰ and 1015(f)²¹ and similar laws that restrict aliens from registering to vote or voting, including through use of: (i) databases or information maintained by the Department of Homeland Security; (ii) State-issued identification records and driver license databases; and (iii) similar records relating to citizenship.

In accordance with federal statutes and policies, the Department of Homeland Security personnel must, in a timely manner, provide verification or immigration status information in response to inquiries from State and local government agencies to verify or ascertain the citizenship or immigration status of individuals. As required by 8 U.S.C. 1373(c), such inquiries must relate to individuals within the jurisdiction of the State or local government agency and must be for a purpose authorized by law. Department of Homeland Security personnel have been directed to comply, to the maximum extent possible and permissible under law, with Section 1373, considering federal statutory requirements, including the Privacy Act of 1974, 5 U.S.C. 552a²², and 8 U.S.C. 1367²³ (special protected class information); as well as other laws, rules, regulations, policies, and requirements regarding verification, information sharing, and confidentiality.

The Systematic Alien Verification for Entitlements Program user agency registration process determines whether a state voter registration agency meets the legal requirements for using the Systematic Alien Verification for Entitlements Program. As part of registering to use Systematic Alien Verification for Entitlements Program, the agency must provide the Systematic Alien Verification for Entitlements Program all applicable legal authorities and voter registration procedures that authorize the agency to engage in voter registration and/or voter list maintenance activities and verify citizenship status before making individual determinations regarding eligibility for voter registration. The United States Citizenship and Immigration Services provides information on its public facing website to assist user agencies understand the above referenced requirements.²⁴

Current Process - Voter Registration and Voter List Maintenance Verification

¹⁹ 52 USC 20507 Requirements with respect to administration of voter registration

²⁰ 18 USC 611 Voting by aliens

²¹ 18 USC 1015 (f) Naturalization, citizenship or alien registry, whoever knowingly makes any false statement or claims that he is a citizen of the United States in order to register to vote or to vote in any Federal, State, or local election (including an initiative, recall, or referendum)-Shall be fined under this title or imprisoned not more than five years, or both

²² 5 USC 552a Records maintained on individuals

²³ 8 USC 1367 Penalties for disclosure of information

²⁴ The Systematic Alien Verification for Entitlements Voter Registration and Voter List Maintenance Fact Sheet is accessible at <https://www.uscis.gov/save/resources/voter-registration-and-voter-list-maintenance-fact-sheet>.



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In understanding the use of the Systematic Alien Verification for Entitlements Program for voter verification-related purposes (voter registration and voter list maintenance), one should also bear in mind the following limitations and considerations:

- The information needed to verify an individual through the Systematic Alien Verification for Entitlements Program is typically not collected on a voter registration application, although it may be available from other sources, especially driver's license applications.
- The Systematic Alien Verification for Entitlements Program previously was only able to verify United States citizenship for naturalized and certain acquired citizens²⁵ for whom the United States Citizenship and Immigration Services has a record of their citizenship.
- The Systematic Alien Verification for Entitlements Program previously was often unable to verify acquired United States citizens because eligible individuals frequently do not apply for and thus do not receive a determination and certificate of United States citizenship from the United States Citizenship and Immigration Services.
- Department of State adjudicates acquired citizens that may not have a record with the United States Citizenship and Immigration Services via the issuance of U.S. passports. Therefore, obtaining passport information from the Department of State is in progress.
- The Department of State maintains records for individuals who have renounced their citizenship. Once a Certificate of Loss of Nationality is approved by the Department of State indicating the official determination of loss of United States nationality, this information is shared with the United States Citizenship and Immigration Services per 8 USC 1373.²⁶
- With the newly established connection to the Social Security Administration's Numident system, the Systematic Alien Verification for Entitlements Program is now able to verify more United States citizens, including United States citizens by birth, when a Social Security Number is provided.

Verification for voter list maintenance purposes often occurs when a state Department of Motor Vehicles compares its records to the state voter agency records to determine if any individuals on the voter rolls identified that they were non-United States citizens when the Department of Motor Vehicles issued their driver's license. The state voter agency would then follow up with those individuals their citizenship status through established state law voter registration challenge procedures. As part of the established voter registration challenge procedures, the State Voter Agency will seek to establish the immigration/citizenship status of the individuals and use Systematic Alien Verification for Entitlements Program as one method to verify the information.

There are likely some situations in which the Systematic Alien Verification for Entitlements Program provides an initial response indicating a non-United States citizen immigration status (e.g., Lawful Permanent Resident) when the registrant is in fact a United States citizen. However, as also noted above, rules for using the Systematic Alien Verification for Entitlements Program prohibit voter registration agencies from relying upon this initial verification response to deny or revoke registration since as by

²⁵ "Acquired citizenship" refers to U.S. citizenship conveyed to children through the naturalization of parents or, under certain circumstances, at birth to foreign-born children of U.S. citizens, provided certain conditions are met.

²⁶ 8 USC 1873 outlines the Communication between government agencies and the Immigration and Naturalization Service.



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asserting United States citizenship as part of registering to vote, registrants inherently disagree with any initial response indicating they are not a United States citizen.

Shortfalls in data accuracy in the system could cause incomplete or false results.

According to Systematic Alien Verification for Entitlements Program subject matter experts, the situations in which the Systematic Alien Verification for Entitlements Program provides an initial non-United States citizen immigration status for a United States citizen who has a certificate of naturalization or citizenship from the United States Citizenship and Immigration Services, or legacy Immigration and Naturalization Service can happen for a variety of reasons. In some instances, the initial non-United States citizen response is due to the lack of an electronic record with the Social Security Administration showing United States citizenship (which was not reliably recorded pre-1981), or the lack of an electronic record of a United States Citizenship and Immigration Services naturalization or acquired citizenship certificate, which is more likely for older certificates issued before recording them in electronic systems became a consistent practice. In addition, although the electronic record-matching algorithms in the United States Citizenship and Immigration Services Person Centric Service that the Systematic Alien Verification for Entitlements Program uses are very good, the United States Citizenship and Immigration Services previously identified and subsequently fixed two algorithm issues that caused Systematic Alien Verification for Entitlements Program to provide an initial verification response of Lawful Permanent Resident for some naturalized citizens and a small number of acquired United States citizens. But again, many of the safeguards noted above are designed to address any imperfections in records and algorithms used to match them.

The delay between the issuance a Certificate of Naturalization during a naturalization ceremony and when the certificate is reflected in source systems and made available to the Systematic Alien Verification for Entitlements Program rarely, if ever, causes the Systematic Alien Verification for Entitlements Program to provide an initial response of non-United States citizen immigration status. It typically takes about one business day plus a few hours for an electronic record of the certificate to be available to the Systematic Alien Verification for Entitlements Program once it is input by the responsible United States Citizenship and Immigration Services office. The Systematic Alien Verification for Entitlements Program rarely, if ever, receives requests to verify United States citizenship during this time.

Additionally, the United States Citizenship and Immigration Services is not the source agency for Social Security Administration related information. While the United States Citizenship and Immigration Services assumes the accuracy of the Social Security Administration data, it cannot verify accuracy of the information and relies on the Social Security Administration to ensure the data accuracy, timeliness, and integrity of their own data.

Customs and Border Protection Integration

The Systematic Alien Verification for Entitlements Program will integrate with the Customs and Border Protection TECS (not an acronym) - Travel Documents and Encounter Data. Customs and Border Protection is now permitting the Systematic Alien Verification for Entitlements Program to query TECS (not an acronym) Travel Documents and Encounter Data system to find a match to US passport information in Customs and Border Protection holdings. The TECS (not an acronym) - Travel Documents and Encounter Data system stores travel document information (i.e. scanned images of documents, biographic information, document details, and photographs) from the United States Citizenship and Immigration Services Lawful Permanent Resident Cards, Department of State-issued United States



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passports and visas, foreign passports, enhanced driver's licenses, and enhanced tribal cards. The TECS (not an acronym) - Travel Documents and Encounter Data USPassportRESTService allows interconnected systems to query TECS (not an acronym) - Travel Documents and Encounter Data for United States passport information. For this use case, the Systematic Alien Verification for Entitlements Program user agencies will input a United States passport number into the Systematic Alien Verification for Entitlements Program system.

The query will trigger the USPassportRESTService to locate the matching United States passport number and return the results to the user. This will allow the Systematic Alien Verification for Entitlements Program to verify all types of United States citizens, including those by birth, which was previously not available. Currently, the United States Citizenship and Immigration Services E-Verify Program has an existing connection to the USPassportRESTService, which also resides within the Verification Information System, like the Systematic Alien Verification for Entitlements Program.

Customs and Border Protection has the authority to collect passport photos pursuant to 5 USC 552a (4).²⁷ Customs and Border Protection receives a routine feed from the Department of State with US passports as they are issued and/or updated. Customs and Border Protection also collects passport information primarily on all travelers seeking to enter the United States at ports of entry. Customs and Border Protection uses this information as part of Agency operations.

Social Security Administration Data Sharing

The Information Sharing Agreement between the Department of Homeland Security-United States Citizenship and Immigration Services and the Social Security Administration documents the Social Security Administration's support by matching data submitted through the Systematic Alien Verification for Entitlements Program to Social Security Administration records in the Social Security Administration's master files of Social Security Number holders and Social Security Number Applications. The United States Citizenship and Immigration Services will only submit verification requests to the Social Security Administration for authorized purposes.

The United States Citizenship and Immigration Services Verification Division and Social Security Administration connection is now live and now connects the Systematic Alien Verification for Entitlements Program with the Social Security Administration's Numident system. Prior to the connection, the United States Citizenship and Immigration Services and Social Security Administration executed a Letter of Agreement that identifies the authorities for both organizations as well as purposes and the data exchange. The United States Citizenship and Immigration Services will document this sharing in a separate Privacy Threshold Analysis.

The Systematic Alien Verification for Entitlements Program performs an automated query of various Systematic Alien Verification for Entitlements Program-accessed federal databases for relevant records. Now, if a Social Security Number is submitted by a user agency, the Systematic Alien Verification for Entitlements Program will verify this enumerator against the Social Security Administration Numident system including the death and citizenship records. If the individual's Social Security account has a record of an A-number or certificate number, the Social Security Administration will provide that information to the Systematic Alien Verification for Entitlements Program, which will in turn be used to

²⁷ 5 USC 552a (4) Records maintained on individuals - collection, or grouping of information about an individual that is maintained by an agency, including, but not limited to, his education, financial transactions, medical history, and criminal or employment history and that contains his name, or the identifying number, symbol, or other identifying particular assigned to the individual, such as a finger or voice print or a photograph.



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validate the information against the Department of Homeland Security records. Verifying citizenship status using Social Security Administration data will be made available to all Systematic Alien Verification for Entitlements Program user agencies.

Department of State Data Sharing

If a United States passport number is submitted, the Systematic Alien Verification for Entitlements Program will verify it against information from Department of State-issued passports maintained by the Custom Boarder Protection. Additionally, Systematic Alien Verification for Entitlements Program will collect information from the Department of State's Consular Consolidated Database / American Citizen Record Query system, which is a consular search engine used by the Department of State to manage and access records related to United States citizens, particularly for consular protection and services, including managing passport requests and applications.

Department of Homeland Security-Department of State Memorandum of Agreement Appendix A allows this query of passport information to be used in Customs and Border Protection TECS (not an acronym) - Travel Documents and Encounter Data to support its missions, including but not limited to verification of United States passports, whenever the document is presented as proof of identity to obtain a benefit, privilege, status, or credential from the Department of Homeland Security, for vetting and screening purposes, and/or for transportation security, national security, law enforcement, border security (including biometric entry and exit initiatives), immigration (including verification purposes such as E-Verify) and counterterrorism purposes.

User Agencies Memoranda of Agreement

All user agency memorandums of agreements contain similar provisions to protect the due process and other rights of individuals for whom states or other user agencies submit verification requests to the Systematic Alien Verification for Entitlements Program²⁸. The United States Citizenship and Immigration Services has an online tool that allows the public to search if a federal, state, local, tribal, or territorial agency is registered with the Systematic Alien Verification for Entitlement Program.²⁹

2. From whom does the Project, Program, or System collect, maintain, use, or disseminate information?

Please check all that apply.

☐ This project does not collect, collect, maintain, use, or disseminate any personally identifiable information³⁰

☒ Members of the public

²⁸ The Systematic Alien Verification for Entitlements Program memorandum of agreement is assessable at <https://www.uscis.gov/save/prospective-user-agencies/register-an-agency-for-save> and under the "How to Register for SAVE" section.

²⁹ The Systematic Alien Verification for Entitlement Program search tool is accessible at <https://www.uscis.gov/save/save-agency-search-tool>.

³⁰ DHS defines personal information as "Personally Identifiable Information" or PII, which is any information that permits the identity of an individual to be directly or indirectly inferred, including any information that is linked or linkable to that individual, regardless of whether the individual is a U.S. citizen, lawful permanent resident, visitor to the U.S., or employee or contractor to the Department. "Sensitive PII" is PII, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. For the purposes of this PTA, SPII and PII are treated the same.



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	☒ U.S. Persons (U.S citizens or lawful permanent residents) ☒ non-U.S. Persons ☒ DHS Employees/Contractors (list Components): United States Citizenship and Immigration Services ☐ Other federal employees or contractors (list agencies): <i>Click here to enter text.</i>
2(a) Is information meant to be collected from or about sensitive/protected populations?	☐ No ☒ 8 USC § 1367 protected individuals (e.g., T, U, VAWA) ³¹ ☒ Refugees/Asylees ☐ Other. Please list:
3. What specific information about individuals is collected, maintained, used, or disseminated?	
<u>Information Collected from Requesting Agencies about applicants for benefits, licenses, or other authorized purposes:</u> • Full Name • Date of birth • Benefit sought • Driver license • State Identification • Citizenship or nationality • Country of birth • A-Number • Social Security Number • Alias • Customer Agency-issued Case Number <u>Unique Immigration Identifiers Used:</u>	

³¹ This involves the following types of individuals: T nonimmigrant status (Victims of Human Trafficking), U nonimmigrant status (Victims of Criminal Activity), or Violence Against Women Act (VAWA). For more information about 1367 populations, please see: DHS Management Directive 002-02, Implementation of Section 1367 Information Provisions, *available at* <http://dhsconnect.dhs.gov/org/comp/mgmt/policies/Directives/002-02.pdf>.



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- Alien number
- United States Citizenship and Immigration Services Number
- I-94 Admission Record Number (a 11-digit admission record assigned to foreign visitors entering the United States by the United States Customs and Border Protection)
- Student and Exchange Visitor Information System Identification Number
- Naturalization or Citizenship Certificate Number
- Card Number / I-797 Receipt Number (unique identifier assigned by the United States Citizenship and Immigration Services to track an immigration application or petition).
- Visa Number
- Foreign passport number (if submitted with another immigration enumerator and issuing country)

Other Identifiers:

- Social Security Number including a truncated version of the Social Security Number where only the last four digits are displayed, with the initial five digits are masked using asterisks (*) or XXXXX
- United States Passport Number
- Agency Data Universal Numbering System

Other Information:

Additional information requested by the agency:

- Employment Authorization Document History
- Grant Date
- Affidavit of Support Sponsor Data³²
 - Full name
 - Current mailing address - In care of name (if any)
 - Current physical address
 - Country of domicile
 - Date of birth
 - Country of birth
 - Social Security Number
 - Immigration Status
 - Sponsors A-number (if any)
 - United States Citizenship and Immigration Services Online Account Number (if any)
 - Military service
 - Employment and income
 - Federal tax return information

³² A United States Citizenship and Immigration Services Affidavit of Support sponsor is an individual who signs a legal contract, Form I-864, agreeing to financially support an intending immigrant, ensuring they won't become a public charge. This sponsor is typically the U.S. citizen, lawful permanent resident, or U.S. national who filed the immigrant petition.



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- Sponsor Deeming and Agency Reimbursement Information Collection
 - Whether the benefit-granting agency approved or denied the application for the means-tested public benefit.
 - If the benefit-granting agency denied the application, if the denial was based upon the information that the Systematic Alien Verification for Entitlements Program 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.
 - Whether the benefit-granting agency conducted a collection action or other proceedings 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).
- Data collected on Form I-864, Affidavit of Support Under Section 213A of the Immigration and Nationality Act
 - Principal Immigrant:
 - Full name
 - Current mailing address - In care of name (if any)
 - Current physical address
 - Country of Citizenship or Nationality
 - Date of birth
 - Alien Registration number
 - United States Citizenship and Immigration Services Online Account Number (if any)
 - Daytime telephone number
 - Principal Immigrant Family Members:
 - Full name
 - Relationship to Principal Immigrant
 - Alien Registration number
 - United States Citizenship and Immigration Services Online Account Number (if any)
 - Daytime telephone number
 - Interpreter's Contact Information, Certification and Signature:
 - Full name
 - Telephone number
 - Email address (if any)
 - Interpreter's certification and signature
 - Preparer's Contact Information:
 - Daytime number
 - Mobile number (if any)
 - Email address (if any)
 - Signature
- Cuban/Haitian, Immigration Status



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- Violence Against Women's Act
- Request Document Review
- Citizenship Status
- Immigration Documentation (uploaded by the user agency to perform additional verification)

Agency User Information

- Agency point of contact name
- Agency point of contact phone number
- Initiated on
- Initiated by

Information Shared with Social Security Administration:

- Full Name
- Date of Birth
- Social Security Number

DATA Received and Maintained from Social Security Administration:

- Social Security Number Match: True/False
- Name Match: True/False
- Date of Birth Match: True/False
- Citizenship Indicator:
- "A" - United States citizen
- "B" - Legal alien, eligible to work
- "C" - Legal alien, not eligible to work
- "D" - Other
- "E" - Alien Student - restricted work authorized
- "F" - Conditionally legalized alien
- Foreign Born Indicator: Citizenship code is not present, but individual was foreign born
- Alien Registration Number: Where applicable
- Certificate Number: Where applicable
- Death Indicator: Yes Deceased / Not Deceased
- Error Code Descriptions: Transaction and record levels

Information Shared with TECS (not an acronym) – TECS (not an acronym)-Travel Documents and Encounter Data for Passport query:

- Full Name
- Date of Birth
- United States passport number



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Information Provided to Requesting User Agencies:

- Case Verification Number: a Systematic Alien Verification for Entitlements Program generated number
- Initial Request Date
- Identification Type
- Identification Number
- Last Name
- Benefit Code
- Benefit Description
- Initial Request Response: Lawful Status, No Lawful Status, Deceased
- Additional Request Date
- Additional Request Response: Lawful Status, No Lawful Status, Deceased
- Third Step Request Date
- Third Step Resolution: Lawful Status, No Lawful Status, Deceased

Additional information for immigrants requested from agencies for which they established the authority/need to receive

- Employment authorization document history
- Grant date
- Affidavit of Support Sponsor Data
- Cuban/Haitian Entrant Information
- Violence Against Women's Act information
- Immigration Status
- Request document review
- Citizenship status
- Photo
- Closed Date
- Receipt number

3(a) Does this Project, Program, or System collect, maintain, use, or disseminate Social Security numbers (SSN) or other types of stand-alone sensitive information?³³ If applicable, check all that apply.

³³ Sensitive PII (or sensitive information) is PII that if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. More information can be found in the DHS Handbook for Safeguarding Sensitive Personally Identifiable Information, available at <https://www.dhs.gov/publication/handbook-safeguarding-sensitive-personally-identifiable-information>.



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☒ Social Security number ☒ Alien Number (A-Number) ☐ Tax Identification Number ☒ Visa Number ☒ Passport Number ☐ Bank Account, Credit Card, or other financial account numbers	☐ Social Media Handle/ID ☒ Driver's License/State ID Number ☐ Biometric identifiers (e.g., <i>FIN, EID</i>) ☒ Biometrics. ³⁴ <i>Please list modalities (e.g., fingerprints, DNA, iris scans): Click here to enter text.</i> ☒ Other. <i>Please list:</i> Form I-94 number, Student and Exchange Visitor Information System Identification number, Naturalization / Citizenship Certificate number, Permanent Resident Card number / Receipt number, and Visa number.
3(b) Please provide the specific legal basis for the collection of SSN:	The Social Security Number is collected from applicants and is used to verify their immigration status/United States citizenship. div. C, title VI, Section 642 of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, Pub. L. No. 104-208, 110 Stat. 3009-707, codified at 8 U.S.C. 1373 (a) and (c). Authority for having a system for verification of citizenship and immigration status of individuals seeking government benefits is governed by the Immigration Reform and Control Act of 1986 Pub. L. No. 99-603, 100 Stat. 3359. Sections 415 and 642 of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, authorizes the collection and use of Social Security Numbers to verify entitlement to public benefits, licenses, and credentials.
3(c) If the SSN is needed to carry out the functions and/or fulfill requirements of the Project, System, or Program, please explain why it is necessary and how it will be used.	
The Social Security Number is used to assist in identity verification for user agencies and in determining benefits eligibility. If possible, the United States Citizenship and Immigration Services will use a truncated Social Security Number if provided by the user agency.	

³⁴ If related to IDENT/HART and applicable, please complete all Data Access Request Analysis (DARA) requirements. This form provides privacy analysis for DHS' IDENT, soon to be HART. The form replaces a PTA where IDENT is a service provider for component records. PRIV uses this form to better understand how data is currently shared, will be shared and how data protection within IDENT will be accomplished. IDENT is a biometrics service provider and any component or agency submitting data to IDENT is a data provider.



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3(d) If the Project, Program, or System requires the use of SSN, what actions are being taken to abide by Privacy Policy Instruction 047-01-010, *SSN Collection and Use Reduction*,³⁵ which requires the use of privacy-enhancing SSN alternatives when there are technological, legal, or regulatory limitations to eliminating the SSN? Note: even if you are properly authorized to collect SSNs, you are required to use an alternate unique identifier. If there are technological, legal, or regulatory limitations to eliminating the SSN, privacy-enhancing alternatives should be taken, such as masking, truncating, or encrypting the SSN, or blocking the display of SSNs in hard copy or digital formats.

The United States Citizenship and Immigration Services has traditionally used an alternative number to the Social Security Number to access records to determine the citizenship/immigration status of user agencies benefit applicants in compliance with the Department of Homeland Security privacy-related policies. However, United States Citizenship and Immigration Services now needs to collect Social Security numbers to facilitate user agencies' ability to submit a request for citizenship/immigrations status of benefit applicants. The United States Citizenship and Immigration Services is working to implement use of the truncated form of a Social Security number (i.e. the last four numbers of a Social Security number rather than the full identifier) to retrieve information from the Social Security Administration. The Systematic Alien Verification for Entitlements Program's user interface will mask the full Social Security Number during data inputs, except for when information is submitted via the bulk uploader. In compliance with the security policy for Social Security numbers, server-side encryption is used for Amazon Simple Storage Service³⁶ and Amazon Relational Database Services³⁷ databases. This uses key management provided by Amazon Web Services for the storage buckets and Relational Database Services databases where Social Security Numbers are housed. Social Security Numbers and Personally Identifiable Information are not exposed in any hard copy documents available for extract from the information system. Additionally, in accordance with the National Institute of Science and Technology and Department of Homeland Security information security and privacy policies, the Systematic Alien Verification for Entitlements Program maintains moderate level controls for the confidentiality of information within the tool.

4. How does the Project, Program, or System retrieve information?

☒ By a unique identifier.³⁸ Please list all unique identifiers used:

- Full name
- Alias

³⁵ See <https://www.dhs.gov/publication/privacy-policy-instruction-047-01-010-ssn-collection-and-use-reduction>.

³⁶ Amazon Simple Storage Service (Amazon S3) is an object storage service offering industry-leading scalability, data availability, security, and performance. Organizations can use this service to store, manage, analyze, and protect any amount of data for virtually any use case, such as data lakes, cloud-native applications, and mobile apps.

³⁷ Amazon Relational Database Service (Amazon RDS) is an easy-to-manage relational database service optimized for total cost of ownership. It is simple to set up, operate, and scale with demand. Amazon RDS automates undifferentiated database management tasks, such as provisioning, configuring, backing up, and patching. Amazon RDS allows customers to create a new database in minutes and offers flexibility to customize databases to meet their needs.

³⁸ Generally, a unique identifier is considered any type of "personally identifiable information," meaning any information that permits the identity of an individual to be directly or indirectly inferred, including any other information which is linked or linkable to that individual regardless of whether the individual is a U.S. citizen, lawful permanent resident, visitor to the U.S., or employee or contractor to the Department.



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	• Date of birth • Immigration enumerator: ○ Alien number/United States Citizenship and Immigration Services Number, ○ Form I-94, Arrival/Departure Record number, ○ Student and Exchange Visitor Information System Identification number, ○ Citizenship or Naturalization Certificate number ○ Card Number / I-797 Receipt Number, ○ Visa Number, or ○ Foreign passport number (if submitted with another immigration enumerator) and issuing country • Social Security Number • United States passport number • Customer Agency-issued Case Number • Case Verification Number ☐ By a non-unique identifier or other means. Please describe: <i>Click here to enter text.</i>
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5. What is the records retention schedule(s) for the information collected for each category type (include the records schedule number)? If no schedule has been approved, please provide proposed schedule or plans to determine it. <i>Note: If no records schedule is in place or are unsure of the applicable records schedule, please reach out to the appropriate Records Management Office.³⁹</i>	Data within Systematic Alien Verification for Entitlements Program is retained for 10 years after the final match determination of the employee or applicant in accordance with NARA approved records retention schedule N1-566-08-07. All United States Citizenship and Immigration Services verification requests will be documented in a transactional database. The retention period is 10 years. The database is not accessible to the public, except as permitted.
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³⁹ See <https://dhsconnect.dhs.gov/org/comp/mgmt/ocio/cdod/rm/Pages/DHS-Records-Officers.aspx>



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5(a) How does the Project, Program, or System ensure that records are disposed of or deleted in accordance with the retention schedule (e.g., technical/automatic purge, manual audit)?	Data is automatically purged annually based on NARA disposal schedule N1-566-08-07.
6. Does this Project, Program, or System connect, receive, or share PII with any other DHS/Component projects, programs, or systems?⁴⁰	☐ No. ☒ Yes. If yes, please list: United States Citizenship and Immigration Services Systems: • Central Index System • Electronic Immigration System • Computer Linked Application Information Management System 3 • Enterprise Citizenship and Immigration Services Centralized Operational Repository • GLOBAL (not an acronym) • RAILS (not an acronym) • Customer Profile Management System • Reengineered Naturalization Application Casework System • Marriage Fraud Amendment System • Salesforce Customer Relationship Management Customer Relationship Management⁴¹ Department of Homeland Security Systems: • Department of Homeland Security OneNet • Immigration and Custom Enforcement Student and Exchange Visitor Information System • Immigration and Custom ENFORCE Integrated Database

⁴⁰ PII may be shared, received, or connected to other DHS systems directly, automatically, or by manual processes.

⁴¹ Provides a unified platform where data from different departments can be accessed and used to improve customer interactions.



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	• Customs and Border Protection Arrival and Departure Information System • Customs and Border Protection TECS (not an acronym) - Travel Documents and Encounter Data - USPassportRESTService • Transportation Security Administration Technology Infrastructure Modernization and Vetting and Credentialing System
7. Does this Project, Program, or System connect, receive, or share PII with any external (non-DHS) government or non-government partners or systems?	☐ No. ☒ Yes. If yes, please list: The following are systems/organizations that the Systematic Alien Verification for Entitlements Program collects/shares information to support user agencies' requests: • United States Military Entrance Processing Command Integrated Resource System • Department of Education Federal Student Aid Central Processing System • Department of Health and Human Services Centers for Medicare & Medicaid Services • Social Security Administration Numident system • Department of Justice Executive Office for Immigration's Immigration Review Information Exchange System • Department of State Consular Consolidated Database Passport The following are systems/organizations that the Systematic Alien Verification for Entitlements provides information that determine benefit eligibility: • Various federal agencies in their role as a user agency



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	Various state, local, tribal, and territory agencies in their role as a Systematic Alien Verification for Entitlements Program user agency
8. Is this sharing pursuant to new or existing information sharing agreement (MOU, MOA, LOI, RTA, etc.)? If applicable, please provide agreement as an attachment.	Existing Please describe applicable information sharing governance in place: - Letter of Agreement between United States Citizenship and Immigration Services and Social Security Administration - Information Sharing Agreement between the Department of Homeland Security, United States Citizenship and Immigration Services and the Social Security Administration regarding citizenship - Computer Matching Agreement with Department of Education - Memorandum of Agreements between United States Citizenship and Immigration Services and each individual user agency
9. Does the Project, Program, or System or have a mechanism to track external disclosures of an individual's PII?	☐ No. What steps will be taken to develop and maintain the accounting: <i>Click here to enter text.</i> ☒ Yes. In what format is the accounting maintained if appropriate (e.g., disclosures to the Department of Justice Office of Special Counsel, Immigration and Customs Enforcement). Verification Information System also has a transactional log that enables the recreation of accounting of disclosures.
10. Does this Project, Program, or System use or collect data involving or from any of the following technologies:	☐ Social Media ☐ Advanced analytics⁴² ☐ Live PII data for testing

⁴² The autonomous or semi-autonomous examination of Personally Identifiable Information using sophisticated techniques and tools to draw conclusions. Advanced Analytics could include human-developed or machine-developed algorithms and encompasses, but is not limited to, the following: data mining, pattern and trend analysis, complex event processing, machine learning or deep learning, artificial intelligence, predictive analytics, big data analytics.



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	☒ No
11. Does this Project, Program, or System use data to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly indicative of terrorist or criminal activity on the part of any individual(s) (i.e., data mining)?⁴³ This does not include subject-based searches.	☒ No. ☐ Yes. If yes, please elaborate: <i>Click here to enter text.</i>
11(a) Is information used for research, statistical, or other similar purposes? If so, how will the information be de-identified, aggregated, or otherwise privacy-protected?	☒ No. ☐ Yes. If yes, please elaborate: <i>Click here to enter text.</i>
12. Does the planned effort include any interaction or intervention with human subjects⁴⁴ via pilot studies, exercises, focus groups, surveys, equipment or technology, observation of public behavior, review of data sets, etc. for research purposes	☒ No. ☐ Yes. If yes, please reach out to the DHS Compliance Assurance Program Office (CAPO) for <u>independent</u> review and approval of this effort. ⁴⁵
13. Does the Project, Program, or System provide role-based or additional privacy training for personnel who have access, <u>in addition</u> to annual privacy training required of all DHS personnel?	☒ No. ☐ Yes. If yes, please list: <i>Click here to enter text.</i>

⁴³ Is this a program involving pattern-based queries, searches, or other analyses of one or more electronic databases, where—

(A) a department or agency of the Federal Government, or a non-Federal entity acting on behalf of the Federal Government, is conducting the queries, searches, or other analyses to discover or locate a predictive pattern or anomaly indicative of terrorist or criminal activity on the part of any individual or individuals.

(B) the queries, searches, or other analyses are not subject-based and do not use personal identifiers of a specific individual, or inputs associated with a specific individual or group of individuals, to retrieve information from the database or databases; and

(C) the purpose of the queries, searches, or other analyses is not solely—

(i) the detection of fraud, waste, or abuse in a government agency or program; or
(ii) the security of a government computer system.

⁴⁴ Human subject means a living individual about whom an investigator conducting research: (1) obtains information or biospecimens through intervention or interaction with the individual, and uses, studies, or analyzes the information or biospecimens; or (2) obtains, uses, studies, analyzes, or generates identifiable private information or identifiable biospecimens.

⁴⁵ For more information about CAPO and their points of contact, please see: <https://www.dhs.gov/publication/capo> or <https://collaborate.st.dhs.gov/orgs/STCSSites/SitePages/Home.aspx?orgid=36>. For more information about the protection of human subjects, please see DHS Directive 026-04: https://www.dhs.gov/sites/default/files/publications/mgmt/general-science-and-innovation/mgmt-dir_026-04-protection-of-human-subjects_revision-01.pdf.



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14. Is there a FIPS 199 determination?⁴⁶	☐ No. ☒ Yes. Please indicate the determinations for each of the following: Confidentiality: ☐ Low ☒ Moderate ☐ High ☐ Undefined Integrity: ☐ Low ☒ Moderate ☐ High ☐ Undefined Availability: ☐ Low ☒ Moderate ☐ High ☐ Undefined
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PTA REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE REVIEWER)

Component Privacy Office Reviewer:	Chiquita Jones/LeVar Sykes
Component Privacy Office Senior Reviewer:	Shannon DiMartino
PRIVCATS ID Number:	0019946
Date submitted to Component Privacy Office:	May 5, 2025
Concurrence from other Component Reviewers involved (if applicable):	Catherine Shorten, Customs and Border Protection, concurrence provided 6/5/2025
Component Privacy Office Recommendation: <i>Please include recommendation below, including what new privacy compliance documentation is needed, as well as any specific privacy risks/mitigations, as necessary.</i>	
The United States Citizenship and Immigration Services submits this updated Privacy Threshold Analysis to document the United States Citizenship and Immigration Services Verification Division and Office of Technology (OIT) changes to the Systematic Alien Verification for Entitlements Program. The United States Citizenship and Immigration Services administers the Systematic Alien Verification for Entitlements Program which is an inter-governmental initiative that provides a web-based service to help	

⁴⁶ FIPS 199 is the Federal Information Processing Standard Publication 199, Standards for Security Categorization of Federal Information and Information Systems and is used to establish security categories of information systems. For more information, see <https://www.nist.gov/itl/fips-general-information>.



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federal, state, territorial, tribal and local agencies and other governmental entities verify United States citizenship or immigration status/category information of applicants for benefits, licenses, or other authorized purposes.

This Privacy Threshold Analysis documents the following changes to the Systematic Alien Verification for Entitlements Program:

1. Expanded search capabilities to allow approved Systematic Alien Verification for Entitlements Program user agencies to verify United States citizenship information using Social Security Numbers and other non-Department of Homeland Security enumerators.
2. A new Social Security Administration system connection to support verification of citizenship/immigration status.
3. A new bulk uploader/list processor function that allows user agencies to upload lists of benefit applicants.
4. Use of the Voter Registration and Voter List Maintenance Verification functionality.
5. The collection of information from the Department of State's Consular Consolidated Database/American Citizen Record Query system.
6. An integration with the Customs and Border Protection TECS (not an acronym) - Travel Documents and Encounter Data system.

The United States Citizenship and Immigration Services Privacy Office recommends Privacy Impact Assessment coverage for the Systematic Alien Verification for Entitlements Program to comply with the eGovernment Act of 2002 as it "collects, maintains, or disseminates information that is in an identifiable form." The information collected, used, stored, and/or disseminated by the Systematic Alien Verification for Entitlements Program meets the definition of Personally Identifiable Information ("PII")/Sensitive Personally Identifiable Information ("SPII")⁴⁷ as it "permits the identity of an individual to be directly or indirectly inferred, including any other information that is linked or linkable to that individual, regardless of whether that individual is a United States citizen, legal permanent resident, or a visitor to the United States, or employee or contractor to the Department." Specifically, the Systematic Alien Verification for Entitlements Program involves information from members of the public applying for benefits, licenses, or other authorized purposes which may include (1) United States citizens and legal permanent residents, (2) individuals who are now current United States citizens and legal permanent residents after previously naturalizing or adjusting their status, or (3) individuals who may ultimately naturalize to become United States citizens or adjust their status to receive legal permanent residency in the future. Depending on the eligibility category certain individuals may be eligible to apply for adjustment of status as soon as one (1) year after their initial immigration benefit is granted,⁴⁸ therefore the United States Citizenship and Immigration Services Privacy Office recommends requiring Privacy Impact Assessment coverage for the Systematic Alien Verification for Entitlements Program to ensure all current and future United States

⁴⁷ Personally Identifiable Information (PII) has numerous official definitions, but in general, it is defined as any information that can be used to identify an individual directly or indirectly, such as a name, email address, Social Security Number or IP address. Sensitive PII (SPII) is generally defined as any PII that if lost, stolen, or disclosed without authorization could result in significant harm to an individual.

⁴⁸ For more information on eligibility categories please refer to: <https://www.uscis.gov/green-card/green-card-eligibility-categories>.



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citizens and legal permanent residents have transparency into how the United States Citizenship and Immigration Services may collect, store, use, and share the information they previously provided to the United States Citizenship and Immigration Services.

The Privacy Office's Technology Oversight Branch recommends that the Systematic Alien Verification for Entitlements Program continues to be designated as a privacy sensitive program that requires privacy compliance coverage. The Technology Oversight Branch recommends that with the new updates to the program documented in this Privacy Threshold Analysis the Systematic Alien Verification for Entitlements Program be identified as not in compliance with the Privacy Act of 1974, as amended, or the E-Government Act of 2002. A Privacy Impact Assessment update and a System of Records Notice update should be published prior to the program's changed collection and use of Personally Identifiable Information, including information on natural born United States citizens. Further, the sharing of Personally Identifiable Information with the Social Security Administration should occur after the System of Records Notice has gone through the required 30-day comment period. The following are the Technology Oversight Branch's recommendations for privacy compliance coverage and additional requirements:

Privacy Impact Assessment

- A new Privacy Impact Assessment Update for DHS/USCIS/PIA-006 Systematic Alien Verification for Entitlements Program must be completed before collection and use of additional information. Specifically, these Privacy Impact Assessment updates would include, but are not limited to:
 - The collection of Social Security Numbers and other information from the Social Security Administration regarding United States citizens, including natural born citizens.
 - The change in legal rationale for now collecting and maintaining Social Security Numbers of United States natural born citizens.
 - The collection and use of Passport Numbers from the Department of State via new system connections.
 - The addition of the Voter Registration and Voter List Maintenance Verification process, including how this process may verify the citizenship status of natural born United States citizens.
 - The implementation of the bulk case upload functionality for User Agencies.
 - Additional privacy risks and mitigation strategies regarding notice, consent, and data accuracy.

System of Records Notice

- An update to DHS/USCIS-004 Systematic Alien Verification for Entitlements Program must be completed before the collection and sharing of additional information. Specifically, these System of Records Notice updates would include, but are not limited to changes to the following sections:
 - Purpose: The System of Records Notice does not currently include the verification of voter registration and voter maintenance lists.



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- Categories of Individuals: Currently, USCIS specifically informs the public it only collects information on naturalized or acquired United States citizens. This section must be updated to discuss that information on natural born United States citizens will also be collected.
- Categories of Records: The System of Records Notice currently informs the public that the Systematic Alien Verification for Entitlements Program only collects Social Security Number of immigrants on the United States Citizenship and Immigration Services Form G-845. This section must be updated to cover the expanded collection and use of Social Security Numbers.
- Sources of Records: The System of Records Notice currently doesn't include the Social Security Administration system of records. This section must be updated to reflect all new source systems including the Social Security Administration Numident system.
- DHS/CBP-011 Customs and Border Protection Primary and Secondary Processing (TECS (not an acronym)) National SAR Initiative December 19, 2008 (73 Federal Register 77778)
- STATE-26 Passport Records, March 24, 2015 (80 Federal Register 15653)
- STATE-39 Visa Records, November 8, 2021 (86 Federal Register 61822)
- SSA-60-0058 Master Files of Social Security Number Holders and Social Security Number Applications, February 20, 2025 (90 Federal Register 10025)

The following is a Plan of Action to ensure that the Systematic Alien Verification for Entitlements Program is brought into compliance with all federal statutes, regulations, and Department of Homeland Security policies.

USCIS Privacy's Action Plan for the Systematic Alien Verification for Entitlements Program

The Systematic Alien Verification for Entitlements Program is an inter-governmental initiative that provides a web-based service to help federal, state, territorial, tribal and local agencies and other governmental entities verify United States citizenship or immigration status/category information of applicants for benefits, licenses, or other authorized purposes.

Action Plan

This plan outlines priority actions necessary to advance the goal and objective of ensuring the Systematic Alien Verification for Entitlements Program is compliant with all applicable privacy laws, regulations, and policies. These actions will ensure that the use of technology by United States Citizenship and Immigration Services and the Systematic Alien Verification for Entitlements Program sustains and does not erode privacy protections relating to the collection, use, dissemination, maintenance, and disposal of personal information. These actions include actively working with the Verification Division, Office of Chief Counsel and the Customs and Border Protection Office of Privacy on this Privacy Threshold Analysis and the draft System of Records Notice along with continued collaboration with these stakeholders and others such as the Department of Homeland Security Privacy Office to ensure Systematic Alien Verification for Entitlements Program is in compliance.

Actions to Be Taken



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To meet these objectives the United States Citizenship and Immigration Services Office of Privacy will complete the following activities:

- Receive United States Citizenship and Immigration Services Chief Privacy Officer adjudication of the initial Systematic Alien Verification for Entitlements Program Privacy Threshold Analysis:
 - Adjudication - Estimated Date of Completion: July 2025
- Draft an updated Systematic Alien Verification for Entitlement Program Privacy Impact Assessment meeting all requirements identified above and submit the draft to the Department of Homeland Security Office of Privacy.
 - Initial Draft - Estimated Date of Completion: July 2025
 - Office of Chief Counsel Review – Estimated Date of Completion: July 2025
 - Submission to Department of Homeland Security – Estimated Date of Completion: August 2025
 - Publication – Estimated August 2025
- Draft an updated Systematic Alien Verification for Entitlement Program System of Records Notice meeting all requirements identified above and submit the draft to the Department of Homeland Security Office of Privacy.
 - Initial Draft - Estimated Date of Completion: June 2025
 - Office of Chief Counsel Review – Estimated Date of Completion: June 2025
 - Submission to Department of Homeland Security – Estimated Date of Completion: July 2025
 - Submission to the Office of Management and Budget and Congress – Estimated July 2025
 - Publication – Estimated July 2025
 - End of 30-day commenting period (and sharing of new routine uses) Estimated August/September 2025
- Draft a Privacy Threshold Analysis documenting the new Systematic Alien Verification for Entitlement Program information sharing agreement between the United States Citizenship and Immigration Services and the Social Security Administration and receive the Chief Privacy Officer's adjudication of the Privacy Threshold Analysis.
 - Estimated Date of Completion: July 2025
- Determine the applicability of the Computer Matching and Privacy Protection Act of 1988 to new or changed aspects of the Systematic Alien Verification for Entitlements Program including the new bulk upload functionality for User Agencies.
 - Hold a discussion regarding the Computer Matching Agreement impacts with representatives from the Department of Homeland Security Privacy Office, United States



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Citizenship and Immigration Services Office of Chief Counsel and Office of Privacy, and Department of Homeland Security Office of General Council.

- Date of Completion: June 2025
- Decide on the need for Computer Matching Agreements with user agencies versus the current Memorandum of Agreements in place with each Systematic Alien Verification for Entitlement Program user agency:
 - Estimated Date of Completion: July 2025

This Privacy Threshold Analysis and Action Plan focuses predominantly on Phases One through Four of the Systematic Alien Verification for Entitlements Program Optimization effort as Phase Five and Phase Six are longer term goals of the optimization effort and are still in the exploratory/planning stage. The United States Citizenship and Immigration Services will update this Privacy Threshold Analysis and Action Plan as needed to support the remaining phases during their development and ensure the Systematic Alien Verification for Entitlements Program is compliant with all applicable laws, regulations, and Department of Homeland Security policies.

The updated Privacy Threshold Analyst should also provide, at a minimum, the following updates:

- New status types that Systematic Alien Verification for Entitlements Program may provide to the user agencies and how any additional verification is completed.
- A discussion about the update to the user memorandum of agreements and the creation of the voter verification specific memorandum of agreements.
- Confirm all responses from the Customs and Border Protection via the use of their USPassportRESTService when matching United States Passport numbers.
- Discuss Customs and Border Protection authority/purpose for collecting United States Passport related photographs and collection of those photographs by the United States Citizenship and Immigration Services.
- A description of how the information received via the integration with the Department of Justice to enable an incarceration/felony related flag will be used internally and if any related information will be sent to the user agencies or the applicants.
- If the Systematic Alien Verification for Entitlements Program will use the existing connection by the E-Verify Program to the USPassportRESTService or will it be a new connection.
- Additional use case information for the Systematic Alien Verification for Entitlements Program use of Department of State information from the USPassportRESTService and the Department of State's Consular Consolidated Database / American Citizen Record Query system.
- Clarification regarding user agency benefit applicants accessing the Systematic Alien Verification for Entitlements Program.
- Additional information regarding notification provided to United States citizens regarding user agencies use of their information.
- What information may be provided to the user agency about the VAWA status of an individual.



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- Discussion of if there could be instances when a natural born United States citizen is unable to be verified based on the data available. Also, if all United States citizens would be able to be verified via the SSA information.
- Confirmation if there are additional responses (besides Lawful Status, No Lawful Status, or Deceased) provided to user agencies now that United States citizens can also be verified.
- A discussion of any updates regarding any new agreements between Department of State and Customs and Border Protection for the sharing and use of United States Passport number information.
- Confirmation of if there is still a connection with the Reengineered Naturalization Application Casework System (which was previously decommissioned) or how information from the previously decommissioned system is still accessed.

PTA ADJUDICATION

(TO BE COMPLETED BY THE COMPONENT PRIVACY OFFICE APPROVER)

Component Privacy Office Approver:	Angela Y. Washington
PTA Approval Date:	July 17, 2025
PTA Expiration Date:	October 17, 2025

DESIGNATION

Privacy Sensitive System:	Yes
Category of System:	System If "other" is selected, please describe: <i>Click here to enter text.</i>
Determination:	☐ Project, Program, System in compliance with full coverage. ☐ Project, Program, System in compliance with interim coverage. ☐ Project, Program, System in compliance until changes implemented. ☒ Project, Program, System not in compliance.
PIA:	PIA Update is required. • DHS/USCIS/PIA-006 Systematic Alien Verification for Entitlement Program ○ This PIA must be updated to document all identified system/programmatic changes.



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SORN:	SORN update is required. - DHS/USCIS-004 Systematic Alien Verification for Entitlements Program, May 27, 2020 (85 FR 31798) - This SORN must be updated to document all identified changes. - DHS/CBP-011 Customs and Border Protection Primary and Secondary Processing (TECS (not an acronym)) National SAR Initiative December 19, 2008 (73 Federal Register 77778) - STATE-26 Passport Records, March 24, 2015 (80 Federal Register 15653) - STATE-39 Visa Records, November 8, 2021 (86 Federal Register 61822) - SSA-60-0058 Master Files of Social Security Number Holders and Social Security Number Applications, February 20, 2025 (90 Federal Register 10025)
Component Privacy Office Adjudication: <i>Please describe rationale for privacy compliance determination above, and any further action(s) that must be taken by Component.</i>	
The USCIS Office of Privacy is submitting this Privacy Threshold Analysis (PTA) to document the Systematic Alien Verification for Entitlements (SAVE) Program. The Systematic Alien Verification for Entitlements Program is an intergovernmental initiative using a web-based service to help federal, state, territorial, tribal and local benefit-issuing and licensing agencies and other governmental entities determine the immigration status or United States citizenship of applicants for public benefits, licenses, grants, credentials, background investigations, and other lawful purposes, so only entitled applicants receive them. The Systematic Alien Verification for Entitlements Program verifies immigration status/category and United States citizenship against Department of Homeland Security-accessed records. The Systematic Alien Verification for Entitlements Program is not a database but queries Department of Homeland Security-accessed federal records to provide registered user agencies with a verification response. The Systematic Alien Verification for Entitlements Program does not determine an applicant's eligibility for a specific benefit or license, as this is the responsibility of the benefit/license granting agency. This Privacy Threshold Analysis is being submitted to document multiple updates and planned updates to the Systematic Alien Verification for Entitlements Program as part of the comprehensive optimization of the Systematic Alien Verification for Entitlements Program to ensure a single, reliable source for verifying immigration status and United States citizenship nationwide. This Privacy Threshold Analysis documents the following key changes: (1) an expanded search capabilities to allow approved Systematic Alien Verification for Entitlements Program user agencies to verify United States citizenship information using Social Security Numbers and other non-Department of Homeland Security enumerators, (2) a new Social Security Administration system connection to support verification of citizenship/immigration status, (3) a new bulk uploader/list processor function that allows user agencies to upload lists of benefit applicants, (4) the use of the Voter Registration and Voter List Maintenance Verification functionality, (5) the collection of information from the Department of State's Consular Consolidated Database/ American	



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Citizen Record Query system, and (6) an integration with the Customs and Border Protection TECS (not an acronym) - Travel Documents and Encounter Data system.

After a thorough review of the PTA, the USCIS Office of Privacy continues to designate the Systematic Alien Verification for Entitlements Program as a privacy sensitive system/program requiring both Privacy Impact Assessment (PIA) and System of Records Notice (SORN) coverage as it collects/uses Personally Identifiable Information (PII) as well as Sensitive Personally Identifiable Information (SPII) from members of the public, including legal permanent residents and United States Citizens.

The United States Citizenship and Immigration Services Office of Privacy recommends Privacy Impact Assessment coverage for the Systematic Alien Verification for Entitlements Program to comply with the eGovernment Act of 2002 as it “collects, maintains, or disseminates information that is in an identifiable form.” The information collected, used, stored, and/or disseminated by the Systematic Alien Verification for Entitlements Program meets the definition of Personally Identifiable Information (“PII”)/Sensitive Personally Identifiable Information (“SPII”)⁴⁹ as it “permits the identity of an individual to be directly or indirectly inferred, including any other information that is linked or linkable to that individual, regardless of whether that individual is a United States citizen, legal permanent resident, or a visitor to the United States, or employee or contractor to the Department.” Specifically, the Systematic Alien Verification for Entitlements Program involves information from members of the public applying for benefits, licenses, or other authorized purposes which may include (1) United States citizens and legal permanent residents, (2) individuals who are now current United States citizens and legal permanent residents after previously naturalizing or adjusting their status, or (3) individuals who may ultimately naturalize to become United States citizens or adjust their status to receive legal permanent residency in the future. Depending on the eligibility category certain individuals may be eligible to apply for adjustment of status as soon as one (1) year after their initial immigration benefit is granted,⁵⁰ therefore the United States Citizenship and Immigration Services Office of Privacy recommends requiring Privacy Impact Assessment coverage for the Systematic Alien Verification for Entitlements Program to ensure all current and future United States citizens and legal permanent residents have transparency into how the United States Citizenship and Immigration Services may collect, store, use, and share the information they previously provided to the United States Citizenship and Immigration Services.

Privacy Impact Assessment (PIA) coverage is provided by the following:

- DHS/USCIS/PIA-006 Systematic Alien Verification for Entitlement Program
 - **For the Systematic Alien Verification for Entitlement Program to be in compliance with the eGovernment Act of 2002, this Privacy Impact Assessment must be**

⁴⁹ Personally Identifiable Information (PII) has numerous official definitions, but in general, it is defined as any information that can be used to identify an individual directly or indirectly, such as a name, email address, Social Security Number or IP address. Sensitive PII (SPII) is generally defined as any PII that if lost, stolen, or disclosed without authorization could result in significant harm to an individual.

⁵⁰ For more information on eligibility categories please refer to: <https://www.uscis.gov/green-card/green-card-eligibility-categories>.



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updated to reflect the identified system and programmatic changes along with a privacy risk assessment of these changes including but not limited to new collections of data, new populations impacted including natural born US citizens, new system connections, new data sharing, and a new bulk upload/reporting functionality.

System of Records Notice (SORN) coverage is required as the information in the Systematic Alien Verification for Entitlement Program is retrieved by a personal identifier. System of Records Notice coverage is provided by the following:

- DHS/USCIS-004 Systematic Alien Verification for Entitlements Program, May 27, 2020 (85 FR 31798)
 - **For the Systematic Alien Verification for Entitlement Program to be in compliance with the Privacy Act of 1974, this System of Records Notice must be updated to reflect the identified system and programmatic changes including that the System of Records will now include information on natural born United States citizens in addition to naturalized or acquired United States citizens. Updates to the System of Records Notice should include but are not limited to updates in the Purpose, Categories of Individuals, Categories of Records, and the Sources of Records sections.**
- DHS/CBP-011 Customs and Border Protection Primary and Secondary Processing (TECS (not an acronym)) National SAR Initiative December 19, 2008 (73 Federal Register 77778)
- STATE-26 Passport Records, March 24, 2015 (80 Federal Register 15653)
- STATE-39 Visa Records, November 8, 2021 (86 Federal Register 61822)
- SSA-60-0058 Master Files of Social Security Number Holders and Social Security Number Applications, February 20, 2025 (90 Federal Register 10025)

While there are currently published SORNs and PIAs associated with the Systematic Alien Verification for Entitlement Program, these documents do not sufficiently provide coverage for the recently implemented and planned system and programmatic changes documented in this Privacy Threshold Analysis. Therefore, the Systematic Alien Verification for Entitlement Program is not in compliance. An updated Privacy Impact Assessment and an updated System of Records Notice must be published for the Systematic Alien Verification for Entitlement Program to be brought into compliance.

An action plan has been developed to enable the Systematic Alien Verification for Entitlement Program to be brought into compliance with all federal laws, statutes, regulations, and Department of Homeland Security policies. A high-level summary of the action plan is as follows:

- Complete the initial Systematic Alien Verification for Entitlements Program Privacy Threshold Analysis.



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- Publish an updated Systematic Alien Verification for Entitlement Program Privacy Impact Assessment to the Department of Homeland Security Office of Privacy website.
- Publish an updated Systematic Alien Verification for Entitlement Program System of Records Notice in the Federal Register and address any comments received during the 30-day public comment period.
- Complete a Privacy Threshold Analysis documenting the new Systematic Alien Verification for Entitlement Program information sharing agreement between the United States Citizenship and Immigration Services and the Social Security Administration.
- Determine the applicability of the Computer Matching and Privacy Protection Act of 1988 and complete any identified requirements.
- Update the Systematic Alien Verification for Entitlements Program Privacy Threshold Analysis and Action Plan as needed to support the ongoing optimization effort.

The Office of Privacy approves this Privacy Threshold Analysis for 3 months to formally document the current privacy posture of the Systematic Alien Verification for Entitlement Program.



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PRIVACY THRESHOLD ANALYSIS (PTA)

This form serves as the official determination to identify the privacy compliance requirements for all Departmental uses of personally identifiable information (PII).

A Privacy Threshold Analysis (PTA) serves as the document used to identify information technology (IT) systems, information collections/forms, technologies, rulemakings, programs, information sharing arrangements, or pilot projects that involve PII and other activities that otherwise impact the privacy of individuals, and to assess whether there is a need for additional privacy compliance documentation or requirements. A PTA includes a general description of the IT system, information collection, form, technology, rulemaking, program, pilot project, information sharing arrangement, or other Department activity and describes what PII is collected (and from whom) and how that information is used. In accordance with the Fair Information Practice Principles (FIPPs),¹ Component Privacy Officers should consider best practices for privacy safeguards and principles when reviewing and adjudicating PTAs.

Please complete the attached PTA and submit it to your Component Privacy Office. If you do not have a Component Privacy Office, please send the PTA to the DHS Privacy Office:

Senior Director, Privacy Compliance
The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
[REDACTED]

The Component or DHS Privacy Office will review this form and assess whether any privacy compliance documentation is required. If privacy compliance documentation is required – such as Privacy Impact Assessment (PIA), System of Records Notice (SORN), Privacy Act Statement/Privacy Notice, or Computer Matching Agreement (CMA) – the Component Privacy Office will send you a copy of the relevant compliance template to complete and return.

¹ See [The Fair Information Practice Principles](#) | Homeland Security.



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PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Project, Program, or System Name:	Systematic Alien Verification for Entitlements Program		
Component or Office:	U.S. Citizenship and Immigration Services (USCIS)	Office or Program:	Verification Division
FISMA Name (if applicable):	Verification Information System	FISMA Number (if applicable):	CIS-06285-MAJ-06285
Type of Project or Program:	System	Project or program status:	Operational
Date first developed:	July 7, 2007	Pilot launch date:	N/A
Date of last PTA update	February 7, 2023	Pilot end date:	N/A
ATO Status (if applicable):²	Complete	Expected ATO/ATP/OA date (if applicable):	Ongoing Authorization

PROJECT, PROGRAM, OR SYSTEM MANAGER

Name:	Irina Sidelnikov		
Office:	Office of Information Technology	Title:	OIT Project Manager
Phone:	[REDACTED]	Email:	[REDACTED]

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name:	Minh Vo		
Phone:	N/A	Email:	[REDACTED]

² The DHS OCIO has implemented a streamlined approach to authorizing an Authority to Operate (ATO), allowing for rapid deployment of new IT systems and initiate using the latest technologies as quickly as possible. This approach is used for selected information systems that meet the required eligibility criteria in order to be operational and connect to the network. For more information, see <https://dhsconnect.dhs.gov/org/comp/mgmt/ocio/ciso/Documents/DHS%20ATP%20Guide%20v2.0.pdf#search=atp>.



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SPECIFIC PTA QUESTIONS

1. Reason for submitting the PTA: Updated PTA

The United States Citizenship and Immigration Services submits this updated Privacy Threshold Analysis to document the United States Citizenship and Immigration Services Verification Division and Office of Technology changes to the Systematic Alien Verification for Entitlements Program. The United States Citizenship and Immigration Services administers the Systematic Alien Verification for Entitlements Program, an inter-governmental initiative that provides a web-based service to help federal, state, territorial, tribal and local agencies and other governmental entities verify United States citizenship or immigration status/category information of applicants for benefits, licenses, or other authorized purposes.

This Privacy Threshold Analysis documents that the Systematic Alien Verification for Entitlements Program has

1. Expanded its search capabilities to allow approved Systematic Alien Verification for Entitlements Program user agencies to verify United States citizenship information using Social Security Numbers and other non-Department of Homeland Security enumerators.
2. A new Social Security Administration system connection to support verification of citizenship/immigration status.
3. A new bulk uploader/list processor function that allows user agencies to upload lists of benefit applicants.
4. Use of the Voter Registration and Voter List Maintenance Verification functionality.
5. The collection of information from the Department of State's Consular Consolidated Database/American Citizen Record Query system. Additionally, the Systematic Alien Verification for Entitlements Program will integrate with the Customs and Border Protection TECS (not an acronym) - Travel Documents and Encounter Data system.

2025 Updates

On April 22, 2025, Homeland Security Secretary Kristi Noem, alongside the United States Citizenship and Immigration Services and the Department of Government Efficiency, announced a comprehensive optimization of the Systematic Alien Verification for Entitlements Program to ensure a single, reliable source for verifying immigration status and United States citizenship nationwide. Congressional, federal, and state stakeholders have periodically expressed interest in using the Systematic Alien Verification for Entitlements to verify naturalized and derived citizenship information during voter registration and/or for voter list maintenance. Verification for voter list maintenance purposes often occurs when a state Department of Motor Vehicles compares its records to state voter agency records to determine if individuals on the voter rolls represented that they were other than U.S. citizens when the Department of Motor Vehicles issued their driver's license. The state voter agency then follows up with those individuals as to their citizenship status through state law voter registration challenge procedures. The United States Citizenship and Immigration Services Verification Division is leading this effort and has identified multiple phases to optimize the program. A high-level summary is provided below, while a more detailed description of each phase follows.



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- Phase 1: Free Service for State, Local, Tribal, Territory agencies and Bulk Uploader. (Estimated completion: Implemented)
- Phase 2: Integration with the Social Security Administration to allow for full Social Security Number to be used as a non-Department of Homeland Security enumerator. (Estimated completion: Implemented)
- Phase 3: Modify the Security Administration integration to allow for truncated Social Security Numbers (last 4-digits) to be used as a non-Department of Homeland Security enumerator. (Estimated completion: July/August 2025)
- Phase 4: Integration with Customs and Border Protection to enable United States passport data, received from the Department of State, to be used within the Systematic Alien Verification for Entitlements Program. (Estimated completion: To be determined)
- Phase 5: Integration with the Department of Justice to enable an incarceration/felony related flag (the flag will be used internally and will not be sent to the agencies or the applicants). (Estimated completion: To be determined)
- Phase 6: Integration with State Driver's Licensing Agencies to enable a Driver License number to be used as a non-Department of Homeland Security enumerator. (Estimated completion: To be determined)

The summary below focuses on phases one (1) through four (4). More detailed information can be found later in this document. Phases five (5) and six (6) are longer term goals of the optimization effort and are still in the exploratory/planning stage. The United States Citizenship and Immigration Services will update this Privacy Threshold Analysis to support the remaining phases during their development.

Phases One (1) through Three (3)

Systematic Alien Verification for Entitlements Program eliminated fees for non-federal users creating Systematic Alien Verification for Entitlements Program cases. User agencies can now create multiple individual cases from a list of data provided by the user. Further, the Systematic Alien Verification for Entitlements Program plans to integrate additional immigration information into search functionality and case results, such as timelines and addresses. Improved automatic status updates and a new user-friendly interface will empower federal, state, local, territorial, and tribal agencies to help prevent individuals who are not qualified for government benefits and licenses from receiving those benefits and licenses. The Department of Homeland Security intends to provide ongoing updates to stakeholders as the Systematic Alien Verification for Entitlements Program Optimization Plan progresses. Systematic Alien Verification for Entitlements Program users must attest to completing the Systematic Alien Verification for Entitlements Program tutorial prior to gaining access to Systematic Alien Verification for Entitlements Program. Users' access is based on their permissions.

The United States Citizenship and Immigration Services has developed and implemented a new bulk uploader/list processor feature to the Systematic Alien Verification for Entitlements Program. This feature will allow program users to upload a list (such as an excel spreadsheet) of benefit applicants to the Systematic Alien Verification for Entitlements Program for processing. Once the list is uploaded, the Systematic Alien Verification for Entitlements Program will accept or not accept the data then, through an automated process, create front-end single-record cases for each entry. Initially the creation of cases using this feature is limited to cases created using an A-number, Citizenship or Naturalization Certificate



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number, or Social Security number. Agencies will not be prompted to institute additional verification when using this process but are instructed to resubmit additional information when the process is unable to return a response. Expansion of this feature in the future may include the ability to create cases with additional enumerators and the ability to request configured information not automatically selected for the benefit type.

User agencies will be able to access each case created using the list processor feature in the Systematic Alien Verification for Entitlements system as normal, by viewing the individual case status and response. The Systematic Alien Verification for Entitlements Program also has a feature available to all the user agencies to generate a report that will list all the cases created, the status of the case and the Systematic Alien Verification for Entitlements Program response. Access to generate the report, including what cases are included, will vary depending upon the individual user's permission. United States Citizenship and Immigration Services is providing this verification service for all benefit requests. There are approximately 1,200 user agencies with access to the Systematic Alien Verification for Entitlements Program to verify immigration status for benefits or entitlements, and in fiscal year 2024, the Systematic Alien Verification for Entitlements Program completed over 24.5 million first step verifications.

The Systematic Alien Verification for Entitlements Program was originally designed only to use a Department of Homeland Security-issued enumerator (such as an alien number or A-Number) to query immigration records, specifically, to provide immigration status to Systematic Alien Verification for Entitlements Program user agencies. The Systematic Alien Verification for Entitlements Program is now expanding to allow Systematic Alien Verification for Entitlements Program user agencies to provide a Social Security Number or a United States Passport number to query the Systematic Alien Verification for Entitlements Program.

The Systematic Alien Verification for Entitlements Program will also add the ability for user agencies to verify truncated Social Security Numbers (last 4 digits) against Social Security Administration records. This will allow the Systematic Alien Verification for Entitlements Program to verify all United States citizens including those by birth, which was previously not available. A benefit applicant's Social Security number can only be used for automated initial verification and cannot be used for additional verification, which will continue to require a Department of Homeland Security immigration enumerator since the Systematic Alien Verification for Entitlements Program does not normally collect Social Security Numbers or passport numbers. The addition of the Voter Registration and Voter List Maintenance Verification, and the Social Security Administration connection is now live. The Systematic Alien Verification for Entitlements Program can now verify United States-born citizens for voter verification agencies.

The Department of Homeland Security/United States Citizenship and Immigration Services seeks access to Social Security Administration information accessed through the Department of Homeland Security/United States Citizenship and Immigration Services Verification Information System³. The United States Citizenship and Immigration Services and the Social Security Administration agreed to the following limitations on the access to, and disclosure and use of information that identifies a verification request as being generated by United States Citizenship and Immigration Services or associated with a United States Citizenship and Immigration Services program:

³ Verification Information System provides services to customers through Systematic Alien Verification for Entitlements and E-Verify (the latter of which will not be used for this initiative).



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- Data or information that identifies a verification request as being generated by United States Citizenship and Immigration Services or associated with a United States Citizenship and Immigration Services program will remain information owned by United States Citizenship and Immigration Services.
- The United States Citizenship and Immigration Services will use the verification responses generated by the Social Security Administration only for the purposes described in the Information Sharing Agreement between the Department of Homeland Security, United States Citizenship and Immigration Services and the Social Security Administration.
- Data or information that identifies a verification request as being generated by the United States Citizenship and Immigration Services or associated with a United States Citizenship and Immigration Services program will be used only as provided in the Information Sharing Agreement by the Social Security Administration.
- Data or information that identifies a verification request as being generated by United States Citizenship and Immigration Services or associated with the United States Citizenship and Immigration Services program provided by Social Security Administration will not be duplicated or disseminated outside Social Security Administration without prior written approval from United States Citizenship and Immigration Services. The United States Citizenship and Immigration Services will not give such approval unless the redisclosure is required by law or is essential to the conduct of the exchange. In such cases, the Social Security Administration, the agency redisclosing the records, must specify in writing what records will be redisclosed, to whom they will be redisclosed, and the reasons that justify redisclosure.
- The United States Citizenship and Immigration Services will not duplicate or disseminate the verification responses for a purpose not covered by the Information Sharing Agreement, within or outside of its agency, without the written permission of the Social Security Administration excepted as required by Federal law. The Social Security Administration will not give such permission, unless Federal law requires disclosure, or disclosure is essential to the purpose of this Agreement. For such permission, The United States Citizenship and Immigration Services must specify in writing what data it is requesting to duplicate or disseminate and to whom, and the reasons that justify such duplication or dissemination.

Administrative Safeguards

The Social Security Administration and the United States Citizenship and Immigration Services will restrict access to the data matched and to any data created by the match to only those users, for example, employees and contractors, who need it to perform their official duties in connection with the uses of the data authorized in the Information Sharing agreement. Further, the Social Security Administration and the United States Citizenship and Immigration Services will advise all personnel with access about the confidential nature of the data, the safeguards required to protect the data, and the civil and criminal sanctions for noncompliance contained in the applicable Federal laws.

Parties, including all personnel with access to information, will be appropriately educated and trained regarding the proper handling of personally identifiable information and proper care of the information systems to ensure the overall safeguarding and security of the information. The Social Security Administration and the United States Citizenship and Immigration Services will ensure that its



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employees, including contractors with the access to any of the information, have completed privacy training on the handling of personally identifiable information.

Phase Four (4)

The United States Citizenship and Immigration Services will need to query other non-United States Citizenship and Immigration Services systems, besides the Social Security Administration's Numident system, with the information provided by the Systematic Alien Verification for Entitlements Program user agency to find the appropriate Department of Homeland Security-issued enumerator to continue with the Systematic Alien Verification for Entitlements Program case processing. For instance, USCIS is researching the possibility of using a United States Passport Number to be able to identify a Department of Homeland Security-issued enumerator. In a case when a User Agency uploads or enters a United States Passport Number instead of a DHS-issued enumerator, the Systematic Alien Verification for Entitlements Program will query another non-United States Citizenship and Immigration Services System using the United States Passport Number along with a unique identifier to find any records and will identify if a Department of Homeland Security-issued enumerator was used by the applicant when applying for a Department of Homeland Security-issued benefit or if a Passport Number was used at a United States Port of Entry and is associated with a Department of Homeland Security-issued enumerator. In this instance, to enable this change, the Systematic Alien Verification for Entitlements Program would integrate with the Customs and Border Protection TECS (not an acronym) - Travel Documents and Encounter Data to match a Passport Number against Customs and Border Protection and Department of State records to attempt to locate a Department of Homeland Security issued enumerator.

The TECS (not an acronym) - Travel Documents and Encounter Data stores travel document information (scanned images of documents, biographic information, document details, and photographs) from the United States Citizenship and Immigration Services Lawful Permanent Resident Cards along with Department of State-issued United States passports, visas, foreign passports, enhanced driver's licenses, and enhanced tribal cards. The TECS (not an acronym) - Travel Documents and Encounter Data USPassportRESTService allows interconnected systems to query TECS (not an acronym) - Travel Documents and Encounter Data for United States passport information. For this use case, the Systematic Alien Verification for Entitlements Program user agency will input a passport number into the Systematic Alien Verification for Entitlements Program. The query will trigger the USPassportRESTService to locate the matching United States passport number and return the results to the user. This will allow the Systematic Alien Verification for Entitlements Program to verify all types of United States citizens, including those by birth, which was previously not available. Currently, the Systematic Alien Verification for Entitlements Program only collects passport numbers for foreign issued passports if it is provided with an additional Department of Homeland Security enumerator. The United States Citizenship and Immigration Services E-Verify has an existing connection to the USPassportRESTService, which also resides within the Verification Information System, like Systematic Alien Verification for Entitlements Program.

The following are updates that were planned prior to Secretary Noem's vision for optimizing the Systematic Alien Verification for Entitlements Program and are still in progress.



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- Systematic Alien Verification for Entitlements Program will update the responses provided to users as part of the Interface Control Agreement Version 38, which enhances the Systematic Alien Verification for Entitlements Program query logic to provide more accurate information based on the need to know. The Systematic Alien Verification for Entitlements Program will add the collection of an uploaded document such as a Naturalization/Citizenship Certificate Number, when the user submits a second step additional verification, as well as the collection of a reason code, which allows the Systematic Alien Verification for Entitlements Program users to provide additional details regarding the applicant's request, particularly during the additional verification process. The Systematic Alien Verification Entitlements responds to users by providing an immigration status/category or United States citizenship. These additional collections will help Systematic Alien Verification for Entitlements Program identify and remedy data issues, reduce overall manual response times, and allow the Systematic Alien Verification for Entitlements Program to improve the quality of first step automated responses.
- A live site environment will be implemented where Systematic Alien Verification for Entitlements web service users can access new and current interface control agreements. This will streamline the process to update the interface control agreements and ensure that the Systematic Alien Verification for Entitlements Program users have access to the most current information for the Interface Control Agreement Version 38.
- The Systematic Alien Verification for Entitlements Program case response screen will be redesigned so that it is easier to read and allow for the additional information to be submitted. The screen will be packaged in a new way to provide the user clear information during the initial verification.

Additionally, Systematic Alien Verification for Entitlements Program will be collecting information from the Department of State's Consular Consolidated Database / American Citizen Record Query system which is a consular search engine used by the Department of State to manage and access records related to United States citizens, particularly for consular protection and services, including managing passport requests and applications.

2024 Update

As part of the Systematic Alien Verification for Entitlements Program's normal review process, the United States Citizenship and Immigration Services intends to access the Department of State's Consular Consolidated Database / American Citizen Record Query system to verify immigration status of applicants for benefits, licenses, and other authorized purposes. The purpose of collecting this information is to confirm the identity of the applicant to determine their status. This process is part of an ongoing effort that began in 2024.

Background

The Systematic Alien Verification for Entitlements Program is an online service for registered federal, state, territorial, tribal, and local government agencies to verify immigration status and United States citizenship of applicants seeking benefits or licenses. Systematic Alien Verification for Entitlements



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Program is not a database but queries Department of Homeland Security-accessed federal records to provide registered user agencies with a verification response.

In 1986, Congress mandated that the Immigration and Naturalization Service, now United States Citizenship and Immigration Services, establish a system to verify the citizenship and immigration status of individuals seeking government benefits and licenses.

The United States Citizenship and Immigration Services Verification Division administers the Systematic Alien Verification for Entitlements Program, which is an intergovernmental initiative using a web-based service to help federal, state, territorial, tribal and local benefit-issuing and licensing agencies and other governmental entities determine the immigration status or United States citizenship of applicants for public benefits, licenses, grants, credentials, background investigations, and other lawful purposes, so only entitled applicants receive them. Systematic Alien Verification for Entitlements Program verifies immigration status/category and United States citizenship against Department of Homeland Security-accessed records. Historically, the Systematic Alien Verification for Entitlements Program has not verified information for United States born citizens as a Department of Homeland Security immigration enumerator was previously required, but now the Systematic Alien Verification for Entitlements Program can verify United States-born United States citizens against Social Security Administration data. The Systematic Alien Verification for Entitlements Program does not determine an applicant's eligibility for a specific benefit or license, as this is the responsibility of the benefit/license granting agency.

As of April 1, 2025, the Systematic Alien Verification for Entitlements Program has revised its transaction charges for all state, local, tribal, and territorial government agencies using the Systematic Alien Verification for Entitlements Program to eliminate those charges. Federal agencies are still charged a fee to use the Systematic Alien Verification for Entitlements Program. The authority for the Systematic Alien Verification for Entitlements Program, and for particular Systematic Alien Verification for Entitlements Program authorized uses can be found in the Immigration Reform and Control Act⁴; the Personal Responsibility and Work Opportunity Reconciliation Act⁵ Title IV, Subtitle A, of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996⁶, and the REAL ID Act of 2005⁷, the Patient Protection and Affordable Care Act of 2010,⁸ and the Federal Aviation Administration Extension, Safety and Security Act of 2016.⁹ In addition, the Systematic Alien Verification for Entitlements Program has an obligation under 8 U.S.C. 1373(c) to "respond to an inquiry by a Federal, State or local government agency, seeking to verify or ascertain the citizenship or immigration status of any individual within the jurisdiction of the agency for any purpose authorized by law, by providing the requested verification or status information."

⁴ Immigration Reform and Control Act of 1986, Public Law No. 99-603

⁵ Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Public Law No. 104-193, 110 Statute 2168

⁶ Title IV, Subtitle A, of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 Public Law 104-208, 110 Statute 3009

⁷ REAL ID Act of 2005, Public Law No. 109-13, 119 Statute 231

⁸ Patient Protection and Affordable Care Act of 2010, Public Law No. 111-148

⁹ Federal Aviation Administration Extension, Safety and Security Act of 2016 (Federal Aviation Administration Act), Public Law No. 114-190 § 3405(d) (July 15, 2016).



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The United States Citizenship and Immigration Services Verification Division operates the Verification Data Information System as the search engine for Systematic Alien Verification for Entitlements Program and the E-Verify Program. The Verification Data Information System accesses nationally accessible databases of selected immigration records to support both the Systematic Alien Verification for Entitlements Program and the E-Verify Program. The Systematic Alien Verification for Entitlements Program queries an individual's immigration status to help the administering agency determine eligibility for any public benefit, license, or credential based on their United States citizenship or immigration status. The United States Citizenship and Immigration Services is obligated by law to respond to an inquiry by a Federal, state or local government agency, seeking to verify or ascertain the citizenship or immigration status of any individual within the jurisdiction of the agency for any purpose authorized by law, by providing the requested verification or status information.

Systematic Alien Verification for Entitlements Program

The United States Citizenship and Immigration Services administers the Systematic Alien Verification for Entitlements Program, an inter-governmental initiative that provides a web-based service to help federal, state, territorial, tribal, and local benefits-issuing and licensing agencies and other governmental entities along with Airport Operators verify the United States citizenship and immigration status/category information of applicants for public benefits or licenses (hereinafter "benefits"). Examples of these benefits include Supplemental Security Income Supplemental Nutrition Assistance Program (formerly food stamps), Temporary Assistance for Needy Families cash assistance, Medicaid, Children's Health Insurance Program, REAL ID compliance, and other statutorily authorized purposes, including voter verification.

The Systematic Alien Verification for Entitlements Program also eliminates fees for database searches, breaks down silos for more accurate results, streamlines List Processor submission, and integrates additional immigration information, such as timelines and addresses. Automatic status updates and a new user-friendly interface will empower Federal, state, local, territorial, and tribal agencies to help prevent individuals who are not qualified for government benefits from receiving those benefits. The Department of Homeland Security intends to provide ongoing updates to stakeholders as the Systematic Alien Verification for Entitlements Program Optimization Plan progresses.

Agency use of the Systematic Alien Verification for Entitlements Program is administered by the Verification Division. All user agencies are required to register with the Systematic Alien Verification for Entitlements Program to access the system prior to using the Systematic Alien Verification for Entitlements Program. The Systematic Alien Verification for Entitlements Program is not a source system and connects with federal immigration systems, and now the Social Security Administration's Numident¹⁰ system, to access applicable information. The Systematic Alien Verification for Entitlements Program also has a Case Status Check capability that allows benefit applicants to view the status of their Systematic Alien Verification for Entitlements Program case. The system provides benefit eligibility checks based on the grant dates. The Verification Division has a three (3) tier process when verifying an individual's immigration status or United States citizenship.

¹⁰ NUMIDENT or "Numerical Identification" refers to the master file of Social Security Administration records containing information about individuals who have applied for or been assigned a Social Security Number. This file includes records for applications, claims, and death records related to individuals with a Social Security Number.



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Users must perform all additional verification procedures the Systematic Alien Verification for Entitlements Program requires and/or the applicant requests prior to denying a benefit based upon a Systematic Alien Verification for Entitlements Program response. Users must provide all applicants who are denied benefits based solely or in part upon the Systematic Alien Verification for Entitlements Program response adequate written notice and the information necessary to contact the Department of Homeland Security so that applicants may correct their immigration records in a timely manner, if necessary.

Initial verification

A Systematic Alien Verification for Entitlements Program user agency accesses their account in the system and either submits requests individually or via a bulk request using the system's new bulk uploader feature. When a Systematic Alien Verification for Entitlements Program user agency submits an online verification request for a benefit applicant, it provides several required identifiers for the benefit applicant from documents presented by the benefit applicant, including first and last name, date of birth, and at least one of the following: an enumerator from the Department of Homeland Security (e.g. Alien number/United States Citizenship and Immigration Services number, Form I-94 Number, Card Number/I-797 Receipt number, Citizenship/Naturalization Certificate Numbers), a Social Security number from Social Security Administration, or a United States passport number from the Department of State. Social Security Numbers and United States passport numbers are new enumerators. Previously, enumerators were solely limited to Department of Homeland Security-issued immigration enumerators.

In the case of a bulk upload the Systematic Alien Verification for Entitlements Program will use an automated process to create individual cases for each benefit applicant on the list.

Using these data fields, the Systematic Alien Verification for Entitlements Program performs an automated query of various Systematic Alien Verification for Entitlements Program-accessed federal databases for relevant records. If a Social Security Number is submitted under this new collection, the Systematic Alien Verification for Entitlements Program will verify this enumerator against the Social Security Administration records, including the Social Security Administration death records and citizenship records. If the individual's Social Security account has a record of an A-number or certificate number, the Social Security Administration will provide that information to the Systematic Alien Verification for Entitlements Program, which will be used to validate that information against the Department of Homeland Security records. If a United States passport number is submitted, the Systematic Alien Verification for Entitlements Program will verify it against the Department of State related records available in the Customs and Border Protection TECS (not an acronym) - Travel Documents and Encounter Data system. When the Systematic Alien Verification for Entitlements Program locates a record pertaining to the benefit applicant in any of these federal databases, the Systematic Alien Verification for Entitlements Program displays a verification response to the user agency within seconds.

Second step, additional verification (Tier 2)



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If the Systematic Alien Verification for Entitlements Program is unable to find a record pertaining to the benefit applicant through the automated first level search of the Department of Homeland Security records, including United States passport records and the Social Security Administration records, it displays a response to the user indicating additional action is required from the user agency, including requesting additional verification when an immigration enumerator is available. If only a Social Security Number is submitted for verification, the user agency will be informed to close the case and submit a new request using either corrected data or an immigration enumerator, since additional verification cannot be conducted with only a Social Security Number.

The Systematic Alien Verification for Entitlements Program user agency may start the additional verification procedure, which may include is an in-depth manual review by Systematic Alien Verification for Entitlements Program staff (Status Verification Analyst) to determine the applicant's immigration status or United States citizenship. At the point at which the "Institute Additional Verification" message is displayed, user agencies must submit the case for additional verification if they are relying on a Systematic Alien Verification for Entitlements Program response to deny a benefit. Additionally, if the user agency receives a response and they have questions about the validity of the response, the user agency may submit a case that already received a Systematic Alien Verification for Entitlements Program response for additional verification. Users must also submit a case for additional verification when requested by the applicant.

User agencies may not rely on a Systematic Alien Verification for Entitlements Program response to approve or deny an application for benefits unless they have followed all required Systematic Alien Verification for Entitlements Program verification procedures. The Systematic Alien Verification for Entitlements Program users are not required to institute additional verification if a user agency has alternate grounds upon which to base its decision to decide a benefit that do not require verification of the applicant's immigration status/category, even where the agency is prompted to do so. Examples of when a user agency has alternate grounds to base a decision that does not require the completion of additional verification include:

- The applicant does not meet eligibility requirements for the benefit unrelated to immigration status/United States citizenship.
- The applicant withdraws their application.
- The applicant cannot be contacted/fails to respond to an agency's request for follow-up.
- The applicant presents documentation the Systematic Alien Verification for Entitlements Program cannot verify (such as a military identification).

This revision adds the collection of an uploaded document which includes immigration enumerators (such as a Form I-94, Arrival/Departure Records, Naturalization/Citizenship Certificate, or passport records) when a case is submitted for second step additional verification as well as a reason code. Reason codes can provide information on why the initial verification was not successful, if the case has been escalated for additional verification, or suggest that additional verification steps may be needed to determine the applicant's status or eligibility for a benefit. Reason codes can also identify if it was a user-initiated additional verification request when the user received an initial Systematic Alien Verification for Entitlements Program response providing an immigration status/category or United States citizenship. These additional collections will help the Systematic Alien Verification for Entitlements Program identify



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and remedy data issues, reduce overall manual response times, and allow the Systematic Alien Verification for Entitlements Program to improve the quality of first step automated responses.

If the second step manual search produces relevant information enabling the verification of immigration status, the Systematic Alien Verification for Entitlements Program provides an electronic response to the inquiring user agency.

If the user agency declines second step additional verification, the verification process ceases. Additional screens notify the user agency that closing the case without performing additional verification means the agency does not have a complete Systematic Alien Verification for Entitlements Program response. The Systematic Alien Verification for Entitlements Program user agencies cannot rely upon an incomplete Systematic Alien Verification for Entitlements Program response to deny a benefit.

Third step Additional Verification with Documents (Tier 3)

If a benefit applicant's immigration status/category cannot be verified on initial or additional verification step when submitting a Department of Homeland Security enumerator, the system will prompt the user agency to resubmit the case with documents. When the prompt is received, the agency must upload a copy of the front and back of the immigration document the applicant presented to the user agency for the Systematic Alien Verification for Entitlements Program to perform detailed manual research at third step. A Department of Homeland Security immigration enumerator is required for the third step additional verification. The Systematic Alien Verification for Entitlements Program cannot complete third step additional verification using non-immigration documentation. The Systematic Alien Verification for Entitlements Program user agencies are legally authorized to make electronic copies of immigration documents for purposes of verifying immigration status. Cases created with just the Social Security Number or a Passport Number as the enumerator are not subject to this step.

If the third step manual review produces relevant information enabling the verification of immigration status/category or United States citizenship, the Systematic Alien Verification for Entitlements Program provides an electronic response to the user agency.

If a benefit applicant's immigration status/category is not verified after completing third step verification, the Systematic Alien Verification for Entitlements Program will provide additional information or guidance on how to proceed.

If the applicant believes their information in the Department of Homeland Security records is incorrect, the applicant can seek a records correction. User agencies should provide the Systematic Alien Verification for Entitlements Program Fact Sheet and Systematic Alien Verification for Entitlements Program Records: Fast Facts for Benefit Applicants¹¹ to benefit applicants that may require records correction.

¹¹ The Systematic Alien Verification for Entitlements Fact Sheet and Systematic Alien Verification for Entitlements Records: Fast Fact for Benefits Applicants is accessible at <https://www.uscis.gov/save/benefit-and-license-applicants/resources-for-benefit-and-license-applicants>



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The Systematic Alien Verification for Entitlements Program user agency continues to have the option of running a web report within the system that will create a file in Adobe format of all cases processed for their organization. The United States Citizenship and Immigration Services provides access to relevant reports of approved or pending cases for Systematic Alien Verification for Entitlements Program user agencies to assist them in managing their Systematic Alien Verification for Entitlements Program cases and monitoring their own compliance with the Systematic Alien Verification for Entitlements Program rules and the federal deeming and reimbursement rules. User agencies can 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, unexpired foreign passport number, I-94 Arrival/Departure Record), and immigration status, only if the benefit was administered.

Voter Registration and Voter List Maintenance Verification

The Illegal Immigration Reform and Immigrant Responsibility Act of 1996 expanded the Systematic Alien Verification for Entitlements Program by requiring the program to respond to inquiries by federal, state and local government agencies seeking to verify or determine the citizenship or immigration status of any individual within the jurisdiction of the agency for any lawful purpose. See 8 U.S.C. § 1373(c). This authority allows agencies to use the Systematic Alien Verification for Entitlements Program for verification of citizenship and immigration status outside of the traditional benefit-granting programs covered by the Immigration Reform and Control Act of 1986. This includes voter registration and voter list maintenance purposes, so long as the agency meets the legal requirements for using the Systematic Alien Verification for Entitlements Program and provides the required applicant information, when submitting verification requests.

On January 20, 2025, and March 25, 2025, the President issued Executive Orders 14159, *Protecting the American People Against Invasion*¹² and 14248, *Preserving and Protecting the Integrity of American Elections*¹³ respectively. Executive Order 14159 requires the Secretary to “promptly issue guidance to ensure maximum compliance by [Department of Homeland Security] personnel with the provisions of 8 U.S.C. 1373¹⁴ and 8 U.S.C. 1644¹⁵ and ensure that State and local governments are provided with the information necessary to fulfill law enforcement, citizenship, or immigration status verification requirements authorized by law.” Executive Order 14248¹⁶ provides, “Federal laws, such as the National Voter Registration Act (Pub. L. 103-31) and the Help America Vote Act (Pub. L. 107-252), require States to maintain an accurate and current Statewide list of every legally registered voter in the State. Pursuant to the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, Department of Homeland Security/United States Citizenship and Immigration Services is required to share database information with States upon request so they can fulfill this duty. 8 U.S.C. 1373(c)¹⁷.” Executive Order 14159¹⁸ directs the Secretary to “ensure that State and local officials have, without the requirement of the payment

¹² <https://www.federalregister.gov/documents/2025/01/29/2025-02006/protecting-the-american-people-against-invasion>

¹³ <https://www.federalregister.gov/documents/2025/03/28/2025-05523/preserving-and-protecting-the-integrity-of-american-elections>

¹⁴ 8 USC 1373 Communication between government agencies and the Immigration and Naturalization Service

¹⁵ 8 USC 1644 Communication between State and local government agencies and Immigration and Naturalization Service

¹⁶ Executive Order 14248 Preserving and Protecting the Integrity of American Elections

¹⁷ 8 USC. 1373(c) Obligation to respond to inquiries

¹⁸ Executive Order 14159 Protecting the American People Against Invasion



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of a fee, access to appropriate systems for verifying the citizenship or immigration status of individuals registering to vote or who are already registered.” The Secretary is also required under Executive Order 14159, in coordination with the Department of Government Efficiency Administrator, to review each State’s publicly available voter registration list and available records concerning voter list maintenance activities as required by 52 U.S.C. 20507¹⁹, alongside Federal immigration databases and State records requested, including through subpoena where necessary and authorized by law, for consistency with Federal requirements. To support this activity the Attorney General is required to prioritize enforcement of 18 U.S.C. 611²⁰ and 1015(f)²¹ and similar laws that restrict aliens from registering to vote or voting, including through use of: (i) databases or information maintained by the Department of Homeland Security; (ii) State-issued identification records and driver license databases; and (iii) similar records relating to citizenship.

In accordance with federal statutes and policies, the Department of Homeland Security personnel must, in a timely manner, provide verification or immigration status information in response to inquiries from State and local government agencies to verify or ascertain the citizenship or immigration status of individuals. As required by 8 U.S.C. 1373(c), such inquiries must relate to individuals within the jurisdiction of the State or local government agency and must be for a purpose authorized by law. Department of Homeland Security personnel have been directed to comply, to the maximum extent possible and permissible under law, with Section 1373, considering federal statutory requirements, including the Privacy Act of 1974, 5 U.S.C. 552a²², and 8 U.S.C. 1367²³ (special protected class information); as well as other laws, rules, regulations, policies, and requirements regarding verification, information sharing, and confidentiality.

The Systematic Alien Verification for Entitlements Program user agency registration process determines whether a state voter registration agency meets the legal requirements for using the Systematic Alien Verification for Entitlements Program. As part of registering to use Systematic Alien Verification for Entitlements Program, the agency must provide the Systematic Alien Verification for Entitlements Program all applicable legal authorities and voter registration procedures that authorize the agency to engage in voter registration and/or voter list maintenance activities and verify citizenship status before making individual determinations regarding eligibility for voter registration. The United States Citizenship and Immigration Services provides information on its public facing website to assist user agencies understand the above referenced requirements.²⁴

Current Process - Voter Registration and Voter List Maintenance Verification

¹⁹ 52 USC 20507 Requirements with respect to administration of voter registration

²⁰ 18 USC 611 Voting by aliens

²¹ 18 USC 1015 (f) Naturalization, citizenship or alien registry, whoever knowingly makes any false statement or claims that he is a citizen of the United States in order to register to vote or to vote in any Federal, State, or local election (including an initiative, recall, or referendum)-Shall be fined under this title or imprisoned not more than five years, or both

²² 5 USC 552a Records maintained on individuals

²³ 8 USC 1367 Penalties for disclosure of information

²⁴ The Systematic Alien Verification for Entitlements Voter Registration and Voter List Maintenance Fact Sheet is accessible at <https://www.uscis.gov/save/resources/voter-registration-and-voter-list-maintenance-fact-sheet>.



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In understanding the use of the Systematic Alien Verification for Entitlements Program for voter verification-related purposes (voter registration and voter list maintenance), one should also bear in mind the following limitations and considerations:

- The information needed to verify an individual through the Systematic Alien Verification for Entitlements Program is typically not collected on a voter registration application, although it may be available from other sources, especially driver's license applications.
- The Systematic Alien Verification for Entitlements Program previously was only able to verify United States citizenship for naturalized and certain acquired citizens²⁵ for whom the United States Citizenship and Immigration Services has a record of their citizenship.
- The Systematic Alien Verification for Entitlements Program previously was often unable to verify acquired United States citizens because eligible individuals frequently do not apply for and thus do not receive a determination and certificate of United States citizenship from the United States Citizenship and Immigration Services.
- Department of State adjudicates acquired citizens that may not have a record with the United States Citizenship and Immigration Services via the issuance of U.S. passports. Therefore, obtaining passport information from the Department of State is in progress.
- The Department of State maintains records for individuals who have renounced their citizenship. Once a Certificate of Loss of Nationality is approved by the Department of State indicating the official determination of loss of United States nationality, this information is shared with the United States Citizenship and Immigration Services per 8 USC 1373.²⁶
- With the newly established connection to the Social Security Administration's Numident system, the Systematic Alien Verification for Entitlements Program is now able to verify more United States citizens, including United States citizens by birth, when a Social Security Number is provided.

Verification for voter list maintenance purposes often occurs when a state Department of Motor Vehicles compares its records to the state voter agency records to determine if any individuals on the voter rolls identified that they were non-United States citizens when the Department of Motor Vehicles issued their driver's license. The state voter agency would then follow up with those individuals their citizenship status through established state law voter registration challenge procedures. As part of the established voter registration challenge procedures, the State Voter Agency will seek to establish the immigration/citizenship status of the individuals and use Systematic Alien Verification for Entitlements Program as one method to verify the information.

There are likely some situations in which the Systematic Alien Verification for Entitlements Program provides an initial response indicating a non-United States citizen immigration status (e.g., Lawful Permanent Resident) when the registrant is in fact a United States citizen. However, as also noted above, rules for using the Systematic Alien Verification for Entitlements Program prohibit voter registration agencies from relying upon this initial verification response to deny or revoke registration since as by

²⁵ "Acquired citizenship" refers to U.S. citizenship conveyed to children through the naturalization of parents or, under certain circumstances, at birth to foreign-born children of U.S. citizens, provided certain conditions are met.

²⁶ 8 USC 1873 outlines the Communication between government agencies and the Immigration and Naturalization Service.



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asserting United States citizenship as part of registering to vote, registrants inherently disagree with any initial response indicating they are not a United States citizen.

Shortfalls in data accuracy in the system could cause incomplete or false results.

According to Systematic Alien Verification for Entitlements Program subject matter experts, the situations in which the Systematic Alien Verification for Entitlements Program provides an initial non-United States citizen immigration status for a United States citizen who has a certificate of naturalization or citizenship from the United States Citizenship and Immigration Services, or legacy Immigration and Naturalization Service can happen for a variety of reasons. In some instances, the initial non-United States citizen response is due to the lack of an electronic record with the Social Security Administration showing United States citizenship (which was not reliably recorded pre-1981), or the lack of an electronic record of a United States Citizenship and Immigration Services naturalization or acquired citizenship certificate, which is more likely for older certificates issued before recording them in electronic systems became a consistent practice. In addition, although the electronic record-matching algorithms in the United States Citizenship and Immigration Services Person Centric Service that the Systematic Alien Verification for Entitlements Program uses are very good, the United States Citizenship and Immigration Services previously identified and subsequently fixed two algorithm issues that caused Systematic Alien Verification for Entitlements Program to provide an initial verification response of Lawful Permanent Resident for some naturalized citizens and a small number of acquired United States citizens. But again, many of the safeguards noted above are designed to address any imperfections in records and algorithms used to match them.

The delay between the issuance a Certificate of Naturalization during a naturalization ceremony and when the certificate is reflected in source systems and made available to the Systematic Alien Verification for Entitlements Program rarely, if ever, causes the Systematic Alien Verification for Entitlements Program to provide an initial response of non-United States citizen immigration status. It typically takes about one business day plus a few hours for an electronic record of the certificate to be available to the Systematic Alien Verification for Entitlements Program once it is input by the responsible United States Citizenship and Immigration Services office. The Systematic Alien Verification for Entitlements Program rarely, if ever, receives requests to verify United States citizenship during this time.

Additionally, the United States Citizenship and Immigration Services is not the source agency for Social Security Administration related information. While the United States Citizenship and Immigration Services assumes the accuracy of the Social Security Administration data, it cannot verify accuracy of the information and relies on the Social Security Administration to ensure the data accuracy, timeliness, and integrity of their own data.

Customs and Border Protection Integration

The Systematic Alien Verification for Entitlements Program will integrate with the Customs and Border Protection TECS (not an acronym) - Travel Documents and Encounter Data. Customs and Border Protection is now permitting the Systematic Alien Verification for Entitlements Program to query TECS (not an acronym) Travel Documents and Encounter Data system to find a match to US passport information in Customs and Border Protection holdings. The TECS (not an acronym) - Travel Documents and Encounter Data system stores travel document information (i.e. scanned images of documents, biographic information, document details, and photographs) from the United States Citizenship and Immigration Services Lawful Permanent Resident Cards, Department of State-issued United States



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passports and visas, foreign passports, enhanced driver's licenses, and enhanced tribal cards. The TECS (not an acronym) - Travel Documents and Encounter Data USPassportRESTService allows interconnected systems to query TECS (not an acronym) - Travel Documents and Encounter Data for United States passport information. For this use case, the Systematic Alien Verification for Entitlements Program user agencies will input a United States passport number into the Systematic Alien Verification for Entitlements Program system.

The query will trigger the USPassportRESTService to locate the matching United States passport number and return the results to the user. This will allow the Systematic Alien Verification for Entitlements Program to verify all types of United States citizens, including those by birth, which was previously not available. Currently, the United States Citizenship and Immigration Services E-Verify Program has an existing connection to the USPassportRESTService, which also resides within the Verification Information System, like the Systematic Alien Verification for Entitlements Program.

Customs and Border Protection has the authority to collect passport photos pursuant to 5 USC 552a (4).²⁷ Customs and Border Protection receives a routine feed from the Department of State with US passports as they are issued and/or updated. Customs and Border Protection also collects passport information primarily on all travelers seeking to enter the United States at ports of entry. Customs and Border Protection uses this information as part of Agency operations.

Social Security Administration Data Sharing

The Information Sharing Agreement between the Department of Homeland Security-United States Citizenship and Immigration Services and the Social Security Administration documents the Social Security Administration's support by matching data submitted through the Systematic Alien Verification for Entitlements Program to Social Security Administration records in the Social Security Administration's master files of Social Security Number holders and Social Security Number Applications. The United States Citizenship and Immigration Services will only submit verification requests to the Social Security Administration for authorized purposes.

The United States Citizenship and Immigration Services Verification Division and Social Security Administration connection is now live and now connects the Systematic Alien Verification for Entitlements Program with the Social Security Administration's Numident system. Prior to the connection, the United States Citizenship and Immigration Services and Social Security Administration executed a Letter of Agreement that identifies the authorities for both organizations as well as purposes and the data exchange. The United States Citizenship and Immigration Services will document this sharing in a separate Privacy Threshold Analysis.

The Systematic Alien Verification for Entitlements Program performs an automated query of various Systematic Alien Verification for Entitlements Program-accessed federal databases for relevant records. Now, if a Social Security Number is submitted by a user agency, the Systematic Alien Verification for Entitlements Program will verify this enumerator against the Social Security Administration Numident system including the death and citizenship records. If the individual's Social Security account has a record of an A-number or certificate number, the Social Security Administration will provide that information to the Systematic Alien Verification for Entitlements Program, which will in turn be used to

²⁷ 5 USC 552a (4) Records maintained on individuals - collection, or grouping of information about an individual that is maintained by an agency, including, but not limited to, his education, financial transactions, medical history, and criminal or employment history and that contains his name, or the identifying number, symbol, or other identifying particular assigned to the individual, such as a finger or voice print or a photograph.



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validate the information against the Department of Homeland Security records. Verifying citizenship status using Social Security Administration data will be made available to all Systematic Alien Verification for Entitlements Program user agencies.

Department of State Data Sharing

If a United States passport number is submitted, the Systematic Alien Verification for Entitlements Program will verify it against information from Department of State-issued passports maintained by the Custom Boarder Protection. Additionally, Systematic Alien Verification for Entitlements Program will collect information from the Department of State's Consular Consolidated Database / American Citizen Record Query system, which is a consular search engine used by the Department of State to manage and access records related to United States citizens, particularly for consular protection and services, including managing passport requests and applications.

Department of Homeland Security-Department of State Memorandum of Agreement Appendix A allows this query of passport information to be used in Customs and Border Protection TECS (not an acronym) - Travel Documents and Encounter Data to support its missions, including but not limited to verification of United States passports, whenever the document is presented as proof of identity to obtain a benefit, privilege, status, or credential from the Department of Homeland Security, for vetting and screening purposes, and/or for transportation security, national security, law enforcement, border security (including biometric entry and exit initiatives), immigration (including verification purposes such as E-Verify) and counterterrorism purposes.

User Agencies Memoranda of Agreement

All user agency memorandums of agreements contain similar provisions to protect the due process and other rights of individuals for whom states or other user agencies submit verification requests to the Systematic Alien Verification for Entitlements Program²⁸. The United States Citizenship and Immigration Services has an online tool that allows the public to search if a federal, state, local, tribal, or territorial agency is registered with the Systematic Alien Verification for Entitlement Program.²⁹

2. From whom does the Project, Program, or System collect, maintain, use, or disseminate information?

Please check all that apply.

☐ This project does not collect, collect, maintain, use, or disseminate any personally identifiable information³⁰

☒ Members of the public

²⁸ The Systematic Alien Verification for Entitlements Program memorandum of agreement is assessable at <https://www.uscis.gov/save/prospective-user-agencies/register-an-agency-for-save> and under the "How to Register for SAVE" section.

²⁹ The Systematic Alien Verification for Entitlement Program search tool is accessible at <https://www.uscis.gov/save/save-agency-search-tool>.

³⁰ DHS defines personal information as "Personally Identifiable Information" or PII, which is any information that permits the identity of an individual to be directly or indirectly inferred, including any information that is linked or linkable to that individual, regardless of whether the individual is a U.S. citizen, lawful permanent resident, visitor to the U.S., or employee or contractor to the Department. "Sensitive PII" is PII, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. For the purposes of this PTA, SPII and PII are treated the same.



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	☒ U.S. Persons (U.S citizens or lawful permanent residents) ☒ non-U.S. Persons ☒ DHS Employees/Contractors (list Components): United States Citizenship and Immigration Services ☐ Other federal employees or contractors (list agencies): <i>Click here to enter text.</i>
2(a) Is information meant to be collected from or about sensitive/protected populations?	☐ No ☒ 8 USC § 1367 protected individuals (e.g., T, U, VAWA) ³¹ ☒ Refugees/Asylees ☐ Other. Please list:
3. What specific information about individuals is collected, maintained, used, or disseminated?	
<u>Information Collected from Requesting Agencies about applicants for benefits, licenses, or other authorized purposes:</u> • Full Name • Date of birth • Benefit sought • Driver license • State Identification • Citizenship or nationality • Country of birth • A-Number • Social Security Number • Alias • Customer Agency-issued Case Number <u>Unique Immigration Identifiers Used:</u>	

³¹ This involves the following types of individuals: T nonimmigrant status (Victims of Human Trafficking), U nonimmigrant status (Victims of Criminal Activity), or Violence Against Women Act (VAWA). For more information about 1367 populations, please see: DHS Management Directive 002-02, Implementation of Section 1367 Information Provisions, *available at* <http://dhsconnect.dhs.gov/org/comp/mgmt/policies/Directives/002-02.pdf>.



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- Alien number
- United States Citizenship and Immigration Services Number
- I-94 Admission Record Number (a 11-digit admission record assigned to foreign visitors entering the United States by the United States Customs and Border Protection)
- Student and Exchange Visitor Information System Identification Number
- Naturalization or Citizenship Certificate Number
- Card Number / I-797 Receipt Number (unique identifier assigned by the United States Citizenship and Immigration Services to track an immigration application or petition).
- Visa Number
- Foreign passport number (if submitted with another immigration enumerator and issuing country)

Other Identifiers:

- Social Security Number including a truncated version of the Social Security Number where only the last four digits are displayed, with the initial five digits are masked using asterisks (*) or XXXXX
- United States Passport Number
- Agency Data Universal Numbering System

Other Information:

Additional information requested by the agency:

- Employment Authorization Document History
- Grant Date
- Affidavit of Support Sponsor Data³²
 - Full name
 - Current mailing address - In care of name (if any)
 - Current physical address
 - Country of domicile
 - Date of birth
 - Country of birth
 - Social Security Number
 - Immigration Status
 - Sponsors A-number (if any)
 - United States Citizenship and Immigration Services Online Account Number (if any)
 - Military service
 - Employment and income
 - Federal tax return information

³² A United States Citizenship and Immigration Services Affidavit of Support sponsor is an individual who signs a legal contract, Form I-864, agreeing to financially support an intending immigrant, ensuring they won't become a public charge. This sponsor is typically the U.S. citizen, lawful permanent resident, or U.S. national who filed the immigrant petition.



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- Sponsor Deeming and Agency Reimbursement Information Collection
 - Whether the benefit-granting agency approved or denied the application for the means-tested public benefit.
 - If the benefit-granting agency denied the application, if the denial was based upon the information that the Systematic Alien Verification for Entitlements Program 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.
 - Whether the benefit-granting agency conducted a collection action or other proceedings 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).
- Data collected on Form I-864, Affidavit of Support Under Section 213A of the Immigration and Nationality Act
 - Principal Immigrant:
 - Full name
 - Current mailing address - In care of name (if any)
 - Current physical address
 - Country of Citizenship or Nationality
 - Date of birth
 - Alien Registration number
 - United States Citizenship and Immigration Services Online Account Number (if any)
 - Daytime telephone number
 - Principal Immigrant Family Members:
 - Full name
 - Relationship to Principal Immigrant
 - Alien Registration number
 - United States Citizenship and Immigration Services Online Account Number (if any)
 - Daytime telephone number
 - Interpreter's Contact Information, Certification and Signature:
 - Full name
 - Telephone number
 - Email address (if any)
 - Interpreter's certification and signature
 - Preparer's Contact Information:
 - Daytime number
 - Mobile number (if any)
 - Email address (if any)
 - Signature
- Cuban/Haitian, Immigration Status



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- Violence Against Women's Act
- Request Document Review
- Citizenship Status
- Immigration Documentation (uploaded by the user agency to perform additional verification)

Agency User Information

- Agency point of contact name
- Agency point of contact phone number
- Initiated on
- Initiated by

Information Shared with Social Security Administration:

- Full Name
- Date of Birth
- Social Security Number

DATA Received and Maintained from Social Security Administration:

- Social Security Number Match: True/False
- Name Match: True/False
- Date of Birth Match: True/False
- Citizenship Indicator:
- "A" - United States citizen
- "B" - Legal alien, eligible to work
- "C" - Legal alien, not eligible to work
- "D" - Other
- "E" - Alien Student - restricted work authorized
- "F" - Conditionally legalized alien
- Foreign Born Indicator: Citizenship code is not present, but individual was foreign born
- Alien Registration Number: Where applicable
- Certificate Number: Where applicable
- Death Indicator: Yes Deceased / Not Deceased
- Error Code Descriptions: Transaction and record levels

Information Shared with TECS (not an acronym) – TECS (not an acronym)-Travel Documents and Encounter Data for Passport query:

- Full Name
- Date of Birth
- United States passport number



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Information Provided to Requesting User Agencies:

- Case Verification Number: a Systematic Alien Verification for Entitlements Program generated number
- Initial Request Date
- Identification Type
- Identification Number
- Last Name
- Benefit Code
- Benefit Description
- Initial Request Response: Lawful Status, No Lawful Status, Deceased
- Additional Request Date
- Additional Request Response: Lawful Status, No Lawful Status, Deceased
- Third Step Request Date
- Third Step Resolution: Lawful Status, No Lawful Status, Deceased

Additional information for immigrants requested from agencies for which they established the authority/need to receive

- Employment authorization document history
- Grant date
- Affidavit of Support Sponsor Data
- Cuban/Haitian Entrant Information
- Violence Against Women's Act information
- Immigration Status
- Request document review
- Citizenship status
- Photo
- Closed Date
- Receipt number

3(a) Does this Project, Program, or System collect, maintain, use, or disseminate Social Security numbers (SSN) or other types of stand-alone sensitive information?³³ If applicable, check all that apply.

³³ Sensitive PII (or sensitive information) is PII that if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. More information can be found in the DHS Handbook for Safeguarding Sensitive Personally Identifiable Information, available at <https://www.dhs.gov/publication/handbook-safeguarding-sensitive-personally-identifiable-information>.



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☒ Social Security number ☒ Alien Number (A-Number) ☐ Tax Identification Number ☒ Visa Number ☒ Passport Number ☐ Bank Account, Credit Card, or other financial account numbers	☐ Social Media Handle/ID ☒ Driver's License/State ID Number ☐ Biometric identifiers (e.g., <i>FIN, EID</i>) ☒ Biometrics. ³⁴ <i>Please list modalities (e.g., fingerprints, DNA, iris scans): Click here to enter text.</i> ☒ Other. <i>Please list:</i> Form I-94 number, Student and Exchange Visitor Information System Identification number, Naturalization / Citizenship Certificate number, Permanent Resident Card number / Receipt number, and Visa number.
3(b) Please provide the specific legal basis for the collection of SSN:	The Social Security Number is collected from applicants and is used to verify their immigration status/United States citizenship. div. C, title VI, Section 642 of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, Pub. L. No. 104-208, 110 Stat. 3009-707, codified at 8 U.S.C. 1373 (a) and (c). Authority for having a system for verification of citizenship and immigration status of individuals seeking government benefits is governed by the Immigration Reform and Control Act of 1986 Pub. L. No. 99-603, 100 Stat. 3359. Sections 415 and 642 of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, authorizes the collection and use of Social Security Numbers to verify entitlement to public benefits, licenses, and credentials.
3(c) If the SSN is needed to carry out the functions and/or fulfill requirements of the Project, System, or Program, please explain why it is necessary and how it will be used.	
The Social Security Number is used to assist in identity verification for user agencies and in determining benefits eligibility. If possible, the United States Citizenship and Immigration Services will use a truncated Social Security Number if provided by the user agency.	

³⁴ If related to IDENT/HART and applicable, please complete all Data Access Request Analysis (DARA) requirements. This form provides privacy analysis for DHS' IDENT, soon to be HART. The form replaces a PTA where IDENT is a service provider for component records. PRIV uses this form to better understand how data is currently shared, will be shared and how data protection within IDENT will be accomplished. IDENT is a biometrics service provider and any component or agency submitting data to IDENT is a data provider.



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3(d) If the Project, Program, or System requires the use of SSN, what actions are being taken to abide by Privacy Policy Instruction 047-01-010, *SSN Collection and Use Reduction*,³⁵ which requires the use of privacy-enhancing SSN alternatives when there are technological, legal, or regulatory limitations to eliminating the SSN? Note: even if you are properly authorized to collect SSNs, you are required to use an alternate unique identifier. If there are technological, legal, or regulatory limitations to eliminating the SSN, privacy-enhancing alternatives should be taken, such as masking, truncating, or encrypting the SSN, or blocking the display of SSNs in hard copy or digital formats.

The United States Citizenship and Immigration Services has traditionally used an alternative number to the Social Security Number to access records to determine the citizenship/immigration status of user agencies benefit applicants in compliance with the Department of Homeland Security privacy-related policies. However, United States Citizenship and Immigration Services now needs to collect Social Security numbers to facilitate user agencies' ability to submit a request for citizenship/immigrations status of benefit applicants. The United States Citizenship and Immigration Services is working to implement use of the truncated form of a Social Security number (i.e. the last four numbers of a Social Security number rather than the full identifier) to retrieve information from the Social Security Administration. The Systematic Alien Verification for Entitlements Program's user interface will mask the full Social Security Number during data inputs, except for when information is submitted via the bulk uploader. In compliance with the security policy for Social Security numbers, server-side encryption is used for Amazon Simple Storage Service³⁶ and Amazon Relational Database Services³⁷ databases. This uses key management provided by Amazon Web Services for the storage buckets and Relational Database Services databases where Social Security Numbers are housed. Social Security Numbers and Personally Identifiable Information are not exposed in any hard copy documents available for extract from the information system. Additionally, in accordance with the National Institute of Science and Technology and Department of Homeland Security information security and privacy policies, the Systematic Alien Verification for Entitlements Program maintains moderate level controls for the confidentiality of information within the tool.

4. How does the Project, Program, or System retrieve information?

☒ By a unique identifier.³⁸ Please list all unique identifiers used:

- Full name
- Alias

³⁵ See <https://www.dhs.gov/publication/privacy-policy-instruction-047-01-010-ssn-collection-and-use-reduction>.

³⁶ Amazon Simple Storage Service (Amazon S3) is an object storage service offering industry-leading scalability, data availability, security, and performance. Organizations can use this service to store, manage, analyze, and protect any amount of data for virtually any use case, such as data lakes, cloud-native applications, and mobile apps.

³⁷ Amazon Relational Database Service (Amazon RDS) is an easy-to-manage relational database service optimized for total cost of ownership. It is simple to set up, operate, and scale with demand. Amazon RDS automates undifferentiated database management tasks, such as provisioning, configuring, backing up, and patching. Amazon RDS allows customers to create a new database in minutes and offers flexibility to customize databases to meet their needs.

³⁸ Generally, a unique identifier is considered any type of "personally identifiable information," meaning any information that permits the identity of an individual to be directly or indirectly inferred, including any other information which is linked or linkable to that individual regardless of whether the individual is a U.S. citizen, lawful permanent resident, visitor to the U.S., or employee or contractor to the Department.



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	• Date of birth • Immigration enumerator: ○ Alien number/United States Citizenship and Immigration Services Number, ○ Form I-94, Arrival/Departure Record number, ○ Student and Exchange Visitor Information System Identification number, ○ Citizenship or Naturalization Certificate number ○ Card Number / I-797 Receipt Number, ○ Visa Number, or ○ Foreign passport number (if submitted with another immigration enumerator) and issuing country • Social Security Number • United States passport number • Customer Agency-issued Case Number • Case Verification Number ☐ By a non-unique identifier or other means. Please describe: <i>Click here to enter text.</i>
5. What is the records retention schedule(s) for the information collected for each category type (include the records schedule number)? If no schedule has been approved, please provide proposed schedule or plans to determine it. <i>Note: If no records schedule is in place or are unsure of the applicable records schedule, please reach out to the appropriate Records Management Office.³⁹</i>	Data within Systematic Alien Verification for Entitlements Program is retained for 10 years after the final match determination of the employee or applicant in accordance with NARA approved records retention schedule N1-566-08-07. All United States Citizenship and Immigration Services verification requests will be documented in a transactional database. The retention period is 10 years. The database is not accessible to the public, except as permitted.

³⁹ See <https://dhsconnect.dhs.gov/org/comp/mgmt/ocio/cdod/rm/Pages/DHS-Records-Officers.aspx>



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5(a) How does the Project, Program, or System ensure that records are disposed of or deleted in accordance with the retention schedule (e.g., technical/automatic purge, manual audit)?	Data is automatically purged annually based on NARA disposal schedule N1-566-08-07.
6. Does this Project, Program, or System connect, receive, or share PII with any other DHS/Component projects, programs, or systems?⁴⁰	☐ No. ☒ Yes. If yes, please list: United States Citizenship and Immigration Services Systems: • Central Index System • Electronic Immigration System • Computer Linked Application Information Management System 3 • Enterprise Citizenship and Immigration Services Centralized Operational Repository • GLOBAL (not an acronym) • RAILS (not an acronym) • Customer Profile Management System • Reengineered Naturalization Application Casework System • Marriage Fraud Amendment System • Salesforce Customer Relationship Management Customer Relationship Management⁴¹ Department of Homeland Security Systems: • Department of Homeland Security OneNet • Immigration and Custom Enforcement Student and Exchange Visitor Information System • Immigration and Custom ENFORCE Integrated Database

⁴⁰ PII may be shared, received, or connected to other DHS systems directly, automatically, or by manual processes.

⁴¹ Provides a unified platform where data from different departments can be accessed and used to improve customer interactions.



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	• Customs and Border Protection Arrival and Departure Information System • Customs and Border Protection TECS (not an acronym) - Travel Documents and Encounter Data - USPassportRESTService • Transportation Security Administration Technology Infrastructure Modernization and Vetting and Credentialing System
7. Does this Project, Program, or System connect, receive, or share PII with any external (non-DHS) government or non-government partners or systems?	☐ No. ☒ Yes. If yes, please list: The following are systems/organizations that the Systematic Alien Verification for Entitlements Program collects/shares information to support user agencies' requests: • United States Military Entrance Processing Command Integrated Resource System • Department of Education Federal Student Aid Central Processing System • Department of Health and Human Services Centers for Medicare & Medicaid Services • Social Security Administration Numident system • Department of Justice Executive Office for Immigration's Immigration Review Information Exchange System • Department of State Consular Consolidated Database Passport The following are systems/organizations that the Systematic Alien Verification for Entitlements provides information that determine benefit eligibility: • Various federal agencies in their role as a user agency



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	Various state, local, tribal, and territory agencies in their role as a Systematic Alien Verification for Entitlements Program user agency
8. Is this sharing pursuant to new or existing information sharing agreement (MOU, MOA, LOI, RTA, etc.)? If applicable, please provide agreement as an attachment.	Existing Please describe applicable information sharing governance in place: - Letter of Agreement between United States Citizenship and Immigration Services and Social Security Administration - Information Sharing Agreement between the Department of Homeland Security, United States Citizenship and Immigration Services and the Social Security Administration regarding citizenship - Computer Matching Agreement with Department of Education - Memorandum of Agreements between United States Citizenship and Immigration Services and each individual user agency
9. Does the Project, Program, or System or have a mechanism to track external disclosures of an individual's PII?	☐ No. What steps will be taken to develop and maintain the accounting: <i>Click here to enter text.</i> ☒ Yes. In what format is the accounting maintained if appropriate (e.g., disclosures to the Department of Justice Office of Special Counsel, Immigration and Customs Enforcement). Verification Information System also has a transactional log that enables the recreation of accounting of disclosures.
10. Does this Project, Program, or System use or collect data involving or from any of the following technologies:	☐ Social Media ☐ Advanced analytics⁴² ☐ Live PII data for testing

⁴² The autonomous or semi-autonomous examination of Personally Identifiable Information using sophisticated techniques and tools to draw conclusions. Advanced Analytics could include human-developed or machine-developed algorithms and encompasses, but is not limited to, the following: data mining, pattern and trend analysis, complex event processing, machine learning or deep learning, artificial intelligence, predictive analytics, big data analytics.



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	☒ No
11. Does this Project, Program, or System use data to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly indicative of terrorist or criminal activity on the part of any individual(s) (i.e., data mining)?⁴³ This does not include subject-based searches.	☒ No. ☐ Yes. If yes, please elaborate: <i>Click here to enter text.</i>
11(a) Is information used for research, statistical, or other similar purposes? If so, how will the information be de-identified, aggregated, or otherwise privacy-protected?	☒ No. ☐ Yes. If yes, please elaborate: <i>Click here to enter text.</i>
12. Does the planned effort include any interaction or intervention with human subjects⁴⁴ via pilot studies, exercises, focus groups, surveys, equipment or technology, observation of public behavior, review of data sets, etc. for research purposes	☒ No. ☐ Yes. If yes, please reach out to the DHS Compliance Assurance Program Office (CAPO) for <u>independent</u> review and approval of this effort. ⁴⁵
13. Does the Project, Program, or System provide role-based or additional privacy training for personnel who have access, <u>in addition</u> to annual privacy training required of all DHS personnel?	☒ No. ☐ Yes. If yes, please list: <i>Click here to enter text.</i>

⁴³ Is this a program involving pattern-based queries, searches, or other analyses of one or more electronic databases, where—

(A) a department or agency of the Federal Government, or a non-Federal entity acting on behalf of the Federal Government, is conducting the queries, searches, or other analyses to discover or locate a predictive pattern or anomaly indicative of terrorist or criminal activity on the part of any individual or individuals.

(B) the queries, searches, or other analyses are not subject-based and do not use personal identifiers of a specific individual, or inputs associated with a specific individual or group of individuals, to retrieve information from the database or databases; and

(C) the purpose of the queries, searches, or other analyses is not solely—

(i) the detection of fraud, waste, or abuse in a government agency or program; or
(ii) the security of a government computer system.

⁴⁴ Human subject means a living individual about whom an investigator conducting research: (1) obtains information or biospecimens through intervention or interaction with the individual, and uses, studies, or analyzes the information or biospecimens; or (2) obtains, uses, studies, analyzes, or generates identifiable private information or identifiable biospecimens.

⁴⁵ For more information about CAPO and their points of contact, please see: <https://www.dhs.gov/publication/capo> or <https://collaborate.st.dhs.gov/orgs/STCSSites/SitePages/Home.aspx?orgid=36>. For more information about the protection of human subjects, please see DHS Directive 026-04: https://www.dhs.gov/sites/default/files/publications/mgmt/general-science-and-innovation/mgmt-dir_026-04-protection-of-human-subjects_revision-01.pdf.



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14. Is there a FIPS 199 determination?⁴⁶	☐ No. ☒ Yes. Please indicate the determinations for each of the following: Confidentiality: ☐ Low ☒ Moderate ☐ High ☐ Undefined Integrity: ☐ Low ☒ Moderate ☐ High ☐ Undefined Availability: ☐ Low ☒ Moderate ☐ High ☐ Undefined
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PTA REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE REVIEWER)

Component Privacy Office Reviewer:	Chiquita Jones/LeVar Sykes
Component Privacy Office Senior Reviewer:	Shannon DiMartino
PRIVCATS ID Number:	0019946
Date submitted to Component Privacy Office:	May 5, 2025
Concurrence from other Component Reviewers involved (if applicable):	Catherine Shorten, Customs and Border Protection, concurrence provided 6/5/2025
Component Privacy Office Recommendation: <i>Please include recommendation below, including what new privacy compliance documentation is needed, as well as any specific privacy risks/mitigations, as necessary.</i>	
The United States Citizenship and Immigration Services submits this updated Privacy Threshold Analysis to document the United States Citizenship and Immigration Services Verification Division and Office of Technology (OIT) changes to the Systematic Alien Verification for Entitlements Program. The United States Citizenship and Immigration Services administers the Systematic Alien Verification for Entitlements Program which is an inter-governmental initiative that provides a web-based service to help	

⁴⁶ FIPS 199 is the Federal Information Processing Standard Publication 199, Standards for Security Categorization of Federal Information and Information Systems and is used to establish security categories of information systems. For more information, see <https://www.nist.gov/itl/fips-general-information>.



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federal, state, territorial, tribal and local agencies and other governmental entities verify United States citizenship or immigration status/category information of applicants for benefits, licenses, or other authorized purposes.

This Privacy Threshold Analysis documents the following changes to the Systematic Alien Verification for Entitlements Program:

1. Expanded search capabilities to allow approved Systematic Alien Verification for Entitlements Program user agencies to verify United States citizenship information using Social Security Numbers and other non-Department of Homeland Security enumerators.
2. A new Social Security Administration system connection to support verification of citizenship/immigration status.
3. A new bulk uploader/list processor function that allows user agencies to upload lists of benefit applicants.
4. Use of the Voter Registration and Voter List Maintenance Verification functionality.
5. The collection of information from the Department of State's Consular Consolidated Database/American Citizen Record Query system.
6. An integration with the Customs and Border Protection TECS (not an acronym) - Travel Documents and Encounter Data system.

The United States Citizenship and Immigration Services Privacy Office recommends Privacy Impact Assessment coverage for the Systematic Alien Verification for Entitlements Program to comply with the eGovernment Act of 2002 as it "collects, maintains, or disseminates information that is in an identifiable form." The information collected, used, stored, and/or disseminated by the Systematic Alien Verification for Entitlements Program meets the definition of Personally Identifiable Information ("PII")/Sensitive Personally Identifiable Information ("SPII")⁴⁷ as it "permits the identity of an individual to be directly or indirectly inferred, including any other information that is linked or linkable to that individual, regardless of whether that individual is a United States citizen, legal permanent resident, or a visitor to the United States, or employee or contractor to the Department." Specifically, the Systematic Alien Verification for Entitlements Program involves information from members of the public applying for benefits, licenses, or other authorized purposes which may include (1) United States citizens and legal permanent residents, (2) individuals who are now current United States citizens and legal permanent residents after previously naturalizing or adjusting their status, or (3) individuals who may ultimately naturalize to become United States citizens or adjust their status to receive legal permanent residency in the future. Depending on the eligibility category certain individuals may be eligible to apply for adjustment of status as soon as one (1) year after their initial immigration benefit is granted,⁴⁸ therefore the United States Citizenship and Immigration Services Privacy Office recommends requiring Privacy Impact Assessment coverage for the Systematic Alien Verification for Entitlements Program to ensure all current and future United States

⁴⁷ Personally Identifiable Information (PII) has numerous official definitions, but in general, it is defined as any information that can be used to identify an individual directly or indirectly, such as a name, email address, Social Security Number or IP address. Sensitive PII (SPII) is generally defined as any PII that if lost, stolen, or disclosed without authorization could result in significant harm to an individual.

⁴⁸ For more information on eligibility categories please refer to: <https://www.uscis.gov/green-card/green-card-eligibility-categories>.



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citizens and legal permanent residents have transparency into how the United States Citizenship and Immigration Services may collect, store, use, and share the information they previously provided to the United States Citizenship and Immigration Services.

The Privacy Office's Technology Oversight Branch recommends that the Systematic Alien Verification for Entitlements Program continues to be designated as a privacy sensitive program that requires privacy compliance coverage. The Technology Oversight Branch recommends that with the new updates to the program documented in this Privacy Threshold Analysis the Systematic Alien Verification for Entitlements Program be identified as not in compliance with the Privacy Act of 1974, as amended, or the E-Government Act of 2002. A Privacy Impact Assessment update and a System of Records Notice update should be published prior to the program's changed collection and use of Personally Identifiable Information, including information on natural born United States citizens. Further, the sharing of Personally Identifiable Information with the Social Security Administration should occur after the System of Records Notice has gone through the required 30-day comment period. The following are the Technology Oversight Branch's recommendations for privacy compliance coverage and additional requirements:

Privacy Impact Assessment

- A new Privacy Impact Assessment Update for DHS/USCIS/PIA-006 Systematic Alien Verification for Entitlements Program must be completed before collection and use of additional information. Specifically, these Privacy Impact Assessment updates would include, but are not limited to:
 - The collection of Social Security Numbers and other information from the Social Security Administration regarding United States citizens, including natural born citizens.
 - The change in legal rationale for now collecting and maintaining Social Security Numbers of United States natural born citizens.
 - The collection and use of Passport Numbers from the Department of State via new system connections.
 - The addition of the Voter Registration and Voter List Maintenance Verification process, including how this process may verify the citizenship status of natural born United States citizens.
 - The implementation of the bulk case upload functionality for User Agencies.
 - Additional privacy risks and mitigation strategies regarding notice, consent, and data accuracy.

System of Records Notice

- An update to DHS/USCIS-004 Systematic Alien Verification for Entitlements Program must be completed before the collection and sharing of additional information. Specifically, these System of Records Notice updates would include, but are not limited to changes to the following sections:
 - Purpose: The System of Records Notice does not currently include the verification of voter registration and voter maintenance lists.



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- Categories of Individuals: Currently, USCIS specifically informs the public it only collects information on naturalized or acquired United States citizens. This section must be updated to discuss that information on natural born United States citizens will also be collected.
- Categories of Records: The System of Records Notice currently informs the public that the Systematic Alien Verification for Entitlements Program only collects Social Security Number of immigrants on the United States Citizenship and Immigration Services Form G-845. This section must be updated to cover the expanded collection and use of Social Security Numbers.
- Sources of Records: The System of Records Notice currently doesn't include the Social Security Administration system of records. This section must be updated to reflect all new source systems including the Social Security Administration Numident system.
- DHS/CBP-011 Customs and Border Protection Primary and Secondary Processing (TECS (not an acronym)) National SAR Initiative December 19, 2008 (73 Federal Register 77778)
- STATE-26 Passport Records, March 24, 2015 (80 Federal Register 15653)
- STATE-39 Visa Records, November 8, 2021 (86 Federal Register 61822)
- SSA-60-0058 Master Files of Social Security Number Holders and Social Security Number Applications, February 20, 2025 (90 Federal Register 10025)

The following is a Plan of Action to ensure that the Systematic Alien Verification for Entitlements Program is brought into compliance with all federal statutes, regulations, and Department of Homeland Security policies.

USCIS Privacy's Action Plan for the Systematic Alien Verification for Entitlements Program

The Systematic Alien Verification for Entitlements Program is an inter-governmental initiative that provides a web-based service to help federal, state, territorial, tribal and local agencies and other governmental entities verify United States citizenship or immigration status/category information of applicants for benefits, licenses, or other authorized purposes.

Action Plan

This plan outlines priority actions necessary to advance the goal and objective of ensuring the Systematic Alien Verification for Entitlements Program is compliant with all applicable privacy laws, regulations, and policies. These actions will ensure that the use of technology by United States Citizenship and Immigration Services and the Systematic Alien Verification for Entitlements Program sustains and does not erode privacy protections relating to the collection, use, dissemination, maintenance, and disposal of personal information. These actions include actively working with the Verification Division, Office of Chief Counsel and the Customs and Border Protection Office of Privacy on this Privacy Threshold Analysis and the draft System of Records Notice along with continued collaboration with these stakeholders and others such as the Department of Homeland Security Privacy Office to ensure Systematic Alien Verification for Entitlements Program is in compliance.

Actions to Be Taken



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To meet these objectives the United States Citizenship and Immigration Services Office of Privacy will complete the following activities:

- Receive United States Citizenship and Immigration Services Chief Privacy Officer adjudication of the initial Systematic Alien Verification for Entitlements Program Privacy Threshold Analysis:
 - Adjudication - Date of Completion: July 2025
- Draft an updated Systematic Alien Verification for Entitlement Program Privacy Impact Assessment meeting all requirements identified above and submit the draft to the Department of Homeland Security Office of Privacy.
 - Initial Draft - Complete
 - Office of Chief Counsel Review – Complete
 - Submission to Department of Homeland Security – Date of Completion: September 2025
 - Publication – Estimated September 2025
- Draft an updated Systematic Alien Verification for Entitlement Program System of Records Notice meeting all requirements identified above and submit the draft to the Department of Homeland Security Office of Privacy.
 - Initial Draft - Complete
 - Office of Chief Counsel Review – Complete
 - Submission to Department of Homeland Security – Date of Completion: September 2025
 - Submission to the Office of Management and Budget and Congress – Estimated September 2025
 - Publication – Estimated September 2025
 - End of 30-day commenting period (and sharing of new routine uses) Estimated October/November 2025
- Draft a Privacy Threshold Analysis documenting the new Systematic Alien Verification for Entitlement Program information sharing agreement between the United States Citizenship and Immigration Services and the Social Security Administration and receive the Chief Privacy Officer's adjudication of the Privacy Threshold Analysis.
 - Estimated Date of Completion: September 2025
- Determine the applicability of the Computer Matching and Privacy Protection Act of 1988 to new or changed aspects of the Systematic Alien Verification for Entitlements Program including the new bulk upload functionality for User Agencies.
 - Hold a discussion regarding the Computer Matching Agreement impacts with representatives from the Department of Homeland Security Privacy Office, United States Citizenship and Immigration Services Office of Chief Counsel and Office of Privacy, and Department of Homeland Security Office of General Council.



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- Date of Completion: June 2025
 - Decide on the need for Computer Matching Agreements with user agencies versus the current Memorandum of Agreements in place with each Systematic Alien Verification for Entitlement Program user agency:
- Date of Completion: July/August 2025

This Privacy Threshold Analysis and Action Plan focuses predominantly on Phases One through Four of the Systematic Alien Verification for Entitlements Program Optimization effort as Phase Five and Phase Six are longer term goals of the optimization effort and are still in the exploratory/planning stage. The United States Citizenship and Immigration Services will update this Privacy Threshold Analysis and Action Plan as needed to support the remaining phases during their development and ensure the Systematic Alien Verification for Entitlements Program is compliant with all applicable laws, regulations, and Department of Homeland Security policies.

The updated Privacy Threshold Analyst should also provide, at a minimum, the following updates:

- New status types that Systematic Alien Verification for Entitlements Program may provide to the user agencies and how any additional verification is completed.
- A discussion about the update to the user memorandum of agreements and the creation of the voter verification specific memorandum of agreements.
- Confirm all responses from the Customs and Border Protection via the use of their USPassportRESTService when matching United States Passport numbers.
- Discuss Customs and Border Protection authority/purpose for collecting United States Passport related photographs and collection of those photographs by the United States Citizenship and Immigration Services.
- A description of how the information received via the integration with the Department of Justice to enable an incarceration/felony related flag will be used internally and if any related information will be sent to the user agencies or the applicants.
- If the Systematic Alien Verification for Entitlements Program will use the existing connection by the E-Verify Program to the USPassportRESTService or will it be a new connection.
- Additional use case information for the Systematic Alien Verification for Entitlements Program use of Department of State information from the USPassportRESTService and the Department of State's Consular Consolidated Database / American Citizen Record Query system.
- Clarification regarding user agency benefit applicants accessing the Systematic Alien Verification for Entitlements Program.
- Additional information regarding notification provided to United States citizens regarding user agencies use of their information.
- What information may be provided to the user agency about the VAWA status of an individual.



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- Discussion of if there could be instances when a natural born United States citizen is unable to be verified based on the data available. Also, if all United States citizens would be able to be verified via the SSA information.
- Confirmation if there are additional responses (besides Lawful Status, No Lawful Status, or Deceased) provided to user agencies now that United States citizens can also be verified.
- A discussion of any updates regarding any new agreements between Department of State and Customs and Border Protection for the sharing and use of United States Passport number information.
- Confirmation of if there is still a connection with the Reengineered Naturalization Application Casework System (which was previously decommissioned) or how information from the previously decommissioned system is still accessed.

PTA ADJUDICATION

(TO BE COMPLETED BY THE COMPONENT PRIVACY OFFICE APPROVER)

Component Privacy Office Approver:	Angela Y. Washington
PTA Approval Date:	September 11, 2025
PTA Expiration Date:	December 11, 2025

DESIGNATION

Privacy Sensitive System:	Yes
Category of System:	System If "other" is selected, please describe: <i>Click here to enter text.</i>
Determination:	☐ Project, Program, System in compliance with full coverage. ☒ Project, Program, System in compliance with interim coverage. ☐ Project, Program, System in compliance until changes implemented. ☐ Project, Program, System not in compliance.
PIA:	PIA Update is required. • DHS/USCIS/PIA-006 Systematic Alien Verification for Entitlement Program ○ This PIA must be updated to document all identified system/programmatic changes.



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SORN:	SORN update is required. - DHS/USCIS-004 Systematic Alien Verification for Entitlements Program, May 27, 2020 (85 FR 31798) - This SORN must be updated to document all identified changes. - DHS/CBP-011 Customs and Border Protection Primary and Secondary Processing (TECS (not an acronym)) National SAR Initiative December 19, 2008 (73 Federal Register 77778) - STATE-26 Passport Records, March 24, 2015 (80 Federal Register 15653) - STATE-39 Visa Records, November 8, 2021 (86 Federal Register 61822) - SSA-60-0058 Master Files of Social Security Number Holders and Social Security Number Applications, February 20, 2025 (90 Federal Register 10025)
Component Privacy Office Adjudication: <i>Please describe rationale for privacy compliance determination above, and any further action(s) that must be taken by Component.</i>	
The USCIS Office of Privacy is submitting this Privacy Threshold Analysis (PTA) to document the Systematic Alien Verification for Entitlements (SAVE) Program. The Systematic Alien Verification for Entitlements Program is an intergovernmental initiative using a web-based service to help federal, state, territorial, tribal and local benefit-issuing and licensing agencies and other governmental entities determine the immigration status or United States citizenship of applicants for public benefits, licenses, grants, credentials, background investigations, and other lawful purposes, so only entitled applicants receive them. The Systematic Alien Verification for Entitlements Program verifies immigration status/category and United States citizenship against Department of Homeland Security-accessed records. The Systematic Alien Verification for Entitlements Program is not a database but queries Department of Homeland Security-accessed federal records to provide registered user agencies with a verification response. The Systematic Alien Verification for Entitlements Program does not determine an applicant's eligibility for a specific benefit or license, as this is the responsibility of the benefit/license granting agency. This Privacy Threshold Analysis is being submitted to document multiple updates and planned updates to the Systematic Alien Verification for Entitlements Program as part of the comprehensive optimization of the Systematic Alien Verification for Entitlements Program to ensure a single, reliable source for verifying immigration status and United States citizenship nationwide. This Privacy Threshold Analysis documents the following key changes: (1) an expanded search capabilities to allow approved Systematic Alien Verification for Entitlements Program user agencies to verify United States citizenship information using Social Security Numbers and other non-Department of Homeland Security enumerators, (2) a new Social Security Administration system connection to support verification of citizenship/immigration status, (3) a new bulk uploader/list processor function that allows user agencies to upload lists of benefit applicants, (4) the use of the Voter Registration and Voter List Maintenance Verification functionality, (5) the collection of information from the Department of State's Consular Consolidated Database/ American	



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Citizen Record Query system, and (6) an integration with the Customs and Border Protection TECS (not an acronym) - Travel Documents and Encounter Data system.

After a thorough review of the PTA, the USCIS Office of Privacy continues to designate the Systematic Alien Verification for Entitlements Program as a privacy sensitive system/program requiring both Privacy Impact Assessment (PIA) and System of Records Notice (SORN) coverage as it collects/uses Personally Identifiable Information (PII) as well as Sensitive Personally Identifiable Information (SPII) from members of the public, including legal permanent residents and United States Citizens.

The United States Citizenship and Immigration Services Office of Privacy recommends Privacy Impact Assessment coverage for the Systematic Alien Verification for Entitlements Program to comply with the eGovernment Act of 2002 as it “collects, maintains, or disseminates information that is in an identifiable form.” The information collected, used, stored, and/or disseminated by the Systematic Alien Verification for Entitlements Program meets the definition of Personally Identifiable Information (“PII”)/Sensitive Personally Identifiable Information (“SPII”)⁴⁹ as it “permits the identity of an individual to be directly or indirectly inferred, including any other information that is linked or linkable to that individual, regardless of whether that individual is a United States citizen, legal permanent resident, or a visitor to the United States, or employee or contractor to the Department.” Specifically, the Systematic Alien Verification for Entitlements Program involves information from members of the public applying for benefits, licenses, or other authorized purposes which may include (1) United States citizens and legal permanent residents, (2) individuals who are now current United States citizens and legal permanent residents after previously naturalizing or adjusting their status, or (3) individuals who may ultimately naturalize to become United States citizens or adjust their status to receive legal permanent residency in the future. Depending on the eligibility category certain individuals may be eligible to apply for adjustment of status as soon as one (1) year after their initial immigration benefit is granted,⁵⁰ therefore the United States Citizenship and Immigration Services Office of Privacy recommends requiring Privacy Impact Assessment coverage for the Systematic Alien Verification for Entitlements Program to ensure all current and future United States citizens and legal permanent residents have transparency into how the United States Citizenship and Immigration Services may collect, store, use, and share the information they previously provided to the United States Citizenship and Immigration Services.

Privacy Impact Assessment (PIA) coverage is provided by the following:

- DHS/USCIS/PIA-006 Systematic Alien Verification for Entitlement Program
 - **For the Systematic Alien Verification for Entitlement Program to be in compliance with the eGovernment Act of 2002, this Privacy Impact Assessment must be**

⁴⁹ Personally Identifiable Information (PII) has numerous official definitions, but in general, it is defined as any information that can be used to identify an individual directly or indirectly, such as a name, email address, Social Security Number or IP address. Sensitive PII (SPII) is generally defined as any PII that if lost, stolen, or disclosed without authorization could result in significant harm to an individual.

⁵⁰ For more information on eligibility categories please refer to: <https://www.uscis.gov/green-card/green-card-eligibility-categories>.



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updated to reflect the identified system and programmatic changes along with a privacy risk assessment of these changes including but not limited to new collections of data, new populations impacted including natural born US citizens, new system connections, new data sharing, and a new bulk upload/reporting functionality.

System of Records Notice (SORN) coverage is required as the information in the Systematic Alien Verification for Entitlement Program is retrieved by a personal identifier. System of Records Notice coverage is provided by the following:

- DHS/USCIS-004 Systematic Alien Verification for Entitlements Program, May 27, 2020 (85 FR 31798)
 - **For the Systematic Alien Verification for Entitlement Program to be in compliance with the Privacy Act of 1974, this System of Records Notice must be updated to reflect the identified system and programmatic changes including that the System of Records will now include information on natural born United States citizens in addition to naturalized or acquired United States citizens. Updates to the System of Records Notice should include but are not limited to updates in the Purpose, Categories of Individuals, Categories of Records, and the Sources of Records sections.**
- DHS/CBP-011 Customs and Border Protection Primary and Secondary Processing (TECS (not an acronym)) National SAR Initiative December 19, 2008 (73 Federal Register 77778)
- STATE-26 Passport Records, March 24, 2015 (80 Federal Register 15653)
- STATE-39 Visa Records, November 8, 2021 (86 Federal Register 61822)
- SSA-60-0058 Master Files of Social Security Number Holders and Social Security Number Applications, February 20, 2025 (90 Federal Register 10025)

While there are currently published SORNs and PIAs associated with the Systematic Alien Verification for Entitlement Program, these documents do not sufficiently provide coverage for the recently implemented and planned system and programmatic changes documented in this Privacy Threshold Analysis. Therefore, the Systematic Alien Verification for Entitlement Program is not in compliance. An updated Privacy Impact Assessment and an updated System of Records Notice must be published for the Systematic Alien Verification for Entitlement Program to be brought into compliance.

An action plan has been developed to enable the Systematic Alien Verification for Entitlement Program to be brought into compliance with all federal laws, statutes, regulations, and Department of Homeland Security policies. A high-level summary of the action plan is as follows:

- Complete the initial Systematic Alien Verification for Entitlements Program Privacy Threshold Analysis.



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- Publish an updated Systematic Alien Verification for Entitlement Program Privacy Impact Assessment to the Department of Homeland Security Office of Privacy website.
- Publish an updated Systematic Alien Verification for Entitlement Program System of Records Notice in the Federal Register and address any comments received during the 30-day public comment period.
- Complete a Privacy Threshold Analysis documenting the new Systematic Alien Verification for Entitlement Program information sharing agreement between the United States Citizenship and Immigration Services and the Social Security Administration.
- Determine the applicability of the Computer Matching and Privacy Protection Act of 1988 and complete any identified requirements.
- Update the Systematic Alien Verification for Entitlements Program Privacy Threshold Analysis and Action Plan as needed to support the ongoing optimization effort.

The Office of Privacy approves this Privacy Threshold Analysis for 3 months to formally document the current privacy posture of the Systematic Alien Verification for Entitlement Program.

On September 10, 2025, USCIS provided the draft Privacy Impact Assessment and System of Records Notice for the Systematic Alien Verification for Entitlements Program to DHS Privacy. These documents reference the collection, use, maintenance, and sharing of the following:

- Information on natural born United States citizens in addition to naturalized or acquired United States citizens
- Voter registration verification
- Social security numbers, including its truncated format
- Sharing of information with the Social Security Administration.

Interim coverage is provided for three (3) months while the Privacy Impact Assessment and System of Records Notice are being reviewed for approval, signature, and publication by DHS Privacy. This interim coverage is only granted for the programmatic changes documented in the Privacy Impact Assessment and System of Records Notice which are currently pending DHS Privacy review.

Any programmatic changes not included in the scope of this Privacy Threshold Analysis will require an update to the Privacy Threshold Analysis to ensure sufficient privacy risk analysis can be completed and any further compliance documentation update requirements can be identified. Further, any programmatic changes to the Systematic Alien Verification for Entitlements Program not documented in these two privacy compliance documents, will require additional updates to the Privacy Impact Assessment and System of Records Notice to be completed and submitted to DHS Privacy prior to receiving interim coverage.

**LETTER AGREEMENT PROVIDING FOR
INFORMATION SHARING BETWEEN THE DEPARTMENT OF HOMELAND
SECURITY (DHS), U.S. CITIZENSHIP AND IMMIGRATION SERVICES (USCIS) AND
THE SOCIAL SECURITY ADMINISTRATION (SSA) REGARDING CITIZENSHIP**

Issue: DHS currently provides, through the USCIS Systematic Alien Verification for Entitlements (SAVE) system, citizenship and immigration status verification services for over 1,200 Federal, State, and local agencies that need to verify citizenship or immigration status to determine eligibility for a benefit or license they administer (including SSA, for verifying eligibility for SSNs). The SAVE system was established pursuant to provisions in the Immigration Reform and Control Act of 1986 (IRCA). 42 U.S.C. § 1320b-7(d). IRCA required that agencies determining eligibility for a number of specified Federal benefit programs,¹ including Food Stamps (now SNAP), unemployment compensation, Medicaid and Supplemental Security Income (SSI) review immigration documentation of aliens requesting benefits that includes “the individual’s alien admission number or alien file number,” and then use that documentation and number to verify with the former Immigration and Naturalization Service (INS) (now DHS)² whether the alien has a status corresponding to eligibility for the benefit.

While the vast majority of agencies participating in SAVE use the system only to verify aliens’ immigration status, there are a few that use it to verify the U.S. citizenship of individuals who are registering, or have previously registered, to vote. SAVE is not able to verify the citizenship of U.S. citizens born in the United States, but it is able to verify citizenship obtained through naturalization or, in certain cases where DHS has relevant records, the citizenship of a foreign-born person that was acquired, either at birth or subsequently, by operation of law (such as through qualifying U.S. citizen parentage).

In all cases, SAVE requires the user agency to provide the name, date of birth and a unique identifier (A-number, I-94 number, or certificate of citizenship or naturalization number) in order to proceed with verification of a U.S. citizen. In some cases, states are able to provide this unique identifier for voters they wish to verify (typically, from a driver’s license record), but more often than not states cannot provide a unique identifier because it is not information included on the approved federal nationwide voter registration application or otherwise normally collected by states from voter registrants. Agencies enter into a Memorandum of Agreement (MOA) with USCIS to use SAVE. Because SAVE is configured to search based on a unique identifier, the MOA requires them to provide the unique identifier in order to initiate verification of an individual.

¹ These programs are all Federally funded and governed overall by Federal statute and regulation, but in some cases (such as SNAP and unemployment compensation) the direct interaction with applicants, including verification, is the responsibility of a State agency. Voting is similar in that respect in that Federal laws govern and protect the right to vote in Federal elections guaranteed to adult citizens by the Constitution, but voter registration and election administration are handled by state and local government.

² Under the transition provisions of the Homeland Security Act of 2002, prior references in law to an agency or official whose function was transferred to the new DHS are deemed to refer to DHS or its appropriate component or official. *See, e.g.*, 6 U.S.C. § 557.

Some states have complained to DHS-USCIS about the limitation on their ability to verify voters caused by the unique identifier requirement and have demanded, citing 8 U.S.C. § 1373(a) and (c), that DHS-USCIS provide a means to verify them without this requirement. The President issued Executive Order (EO) 14159, *Protecting the American People Against Invasion*,³ which requires the Secretary to “promptly issue guidance to ensure maximum compliance by [DHS] personnel with the provisions of 8 U.S.C. 1373 and 8 U.S.C. 1644 and ensure that State and local governments are provided with the information necessary to fulfill law enforcement, citizenship, or immigration status verification requirements authorized by law.”⁴

More recently, the President issued EO 14248, *Preserving and Protecting the Integrity of American Elections*.⁵ EO 14248 provides, “Federal laws, such as the National Voter Registration Act (Pub. L. 103-31) and the Help America Vote Act (Pub. L. 107-252), require States to maintain an accurate and current Statewide list of every legally registered voter in the State. And [DHS] is required to share database information with States upon request so they can fulfill this duty. 8 U.S.C. 1373(c).”⁶ The EO directs the Secretary to “ensure that State and local officials have, without the requirement of the payment of a fee, access to appropriate systems for verifying the citizenship or immigration status of individuals registering to vote or who are already registered.”⁷ The Secretary is also required under the EO, in coordination with the DOGE Administrator, to review each State’s publicly available voter registration list and available records concerning voter list maintenance activities as required by 52 U.S.C. § 20507, alongside Federal immigration databases and State records requested, including through subpoena where necessary and authorized by law, for consistency with Federal requirements.⁸

To support this activity the Attorney General is required to prioritize enforcement of 18 U.S.C. §§ 611 and 1015(f) and similar laws that restrict aliens from registering to vote or voting, including through use of: (i) databases or information maintained by DHS; (ii) State-issued identification records and driver license databases; and (iii) similar records relating to citizenship.⁹

The Commissioner of Social Security also must assist states in determining whether individuals are eligible to register and vote by taking all appropriate action to make available the Social Security Number Verification Service, the Death Master File, and any other Federal databases containing relevant information to all State and local election officials engaged in verifying the eligibility of individuals registering to vote or who are already registered.¹⁰

³ 90 Fed. Reg. 8,443 (Jan. 20, 2025).

⁴ EO 14159, § 18.

⁵ 90 Fed. Reg. 14,005 (Mar. 25, 2025).

⁶ EO 14248 § 1.

⁷ *Id.* § 2(b)(i).

⁸ *Id.* § 2(b)(iii).

⁹ *Id.* § 2(e).

¹⁰ *Id.* § 3(a).

Accordingly, as required by these Executive Orders, DHS personnel must timely provide verification or immigration status information in response to inquiries from State and local government agencies to verify or ascertain the citizenship or immigration status of individuals. As required by 8 U.S.C. § 1373(c), such inquiries must relate to individuals within the jurisdiction of the State or local government agency and must be for a purpose authorized by law. DHS personnel have been directed to comply, to the maximum extent possible and permissible under law, with section 1373, taking into account federal statutory requirements, including the Privacy Act of 1974, 5 U.S.C. § 552a, and 8 U.S.C. § 1367 (special protected class information); as well as other laws, rules, regulations, policies, and requirements regarding verification, information sharing, and confidentiality.

DHS currently has systems in place, such as SAVE and U.S. Immigration and Customs Enforcement's Law Enforcement Support Center (LESC), to respond to inquiries from State and local government agencies to verify or ascertain the citizenship or immigration status of individuals. But neither 8 U.S.C. § 1373(c) nor § 1644 requires DHS to limit responses only to inquiries through the systems currently in place. If DHS possesses the requested verification or status information—whether or not in a system, such as SAVE or LESC—DHS must provide such information in accordance with §§ 1373(c) and 1644.

USCIS has requested SSA assistance with respect to information regarding citizenship in its possession that would greatly assist with this and falls within § 1373(a)'s reference to "information regarding the citizenship . . . of any individual." This request is consistent with the spirit of these EOs, the references to interagency communication in § 1373(a), and DHS efforts to fully implement these authorities in order to provide as responsive and comprehensive responses as possible to State and local information requests under § 1373(c) in accord with DHS's broad interpretation of its responsibilities. DHS thus has requested that SSA comply, to the maximum extent possible and permissible under law, with § 1373(a), taking into account federal statutory requirements, as well as other laws, rules, regulations, policies, and requirements regarding verification, information sharing, and confidentiality.

Proposal to address the issue: SAVE's citizenship information verification initiative seeks to provide timely verification of citizenship or immigration status information in response to voter verification and other authorized inquiries from Federal, State, territorial, tribal and local government agencies seeking to verify or ascertain the citizenship or immigration status of individuals within their jurisdiction by using a social security number, or part thereof, as a search term or method to locate additional information in DHS-USCIS accessed records regarding the individual.

DHS-USCIS seeks access to SSA information accessed through the DHS-USCIS Verification Information System (VIS)¹¹ for the purpose of verifying the citizenship and immigration status for benefits and licenses, as authorized by section 103 of the Immigration and Nationality Act, Pub. L. No. 82-414, as amended, 8 U.S.C. § 1103, Section 121(c)(1), Part C, of the Immigration Reform and Control Act of 1986, Pub. L. No. 99-603, 42 U.S.C. § 1320b-7 and note, and section 642 of the Illegal Immigration Reform and Immigrant

¹¹ VIS provides services to customers through SAVE and E-Verify (the latter of which will not be used for this initiative).

Responsibility Act of 1996, Pub. L. No. 104-208, as amended, 8 U.S.C. § 1373(c).

SSA is providing assistance by sending to, and receiving from, DHS-USCIS information regarding the citizenship or immigration status, lawful or unlawful, of individuals within its records. SSA is authorized to participate in this information sharing under the authority of the Social Security Act, 42 U.S.C. § 1306, and pursuant to 8 U.S.C. § 1373(a).

This information sharing is also subject to requirements of:

- The Privacy Act of 1974, 5 U.S.C. § 552a;
- The Federal Information Security Management Act of 2014 (Pub. L. 113-283);
- 20 C.F.R. § 401.120; and

other laws, rules, regulations and applicable agency policies.

DHS-USCIS seeks SSA support by matching data submitted through SAVE to SSA records in SSA's Master Files of Social Security Number (SSN) Holders and SSN Applications, System of Record Notice 60-0058, 90 Fed. Reg. 10025 (Feb. 20, 2025) ("Enumeration System"). Specifically, SAVE User Agencies input information into SAVE from benefit applications, and DHS-USCIS sends the information to SSA to confirm or not confirm that the SSN, name, and date of birth match information in SSA records. SSA is also asked to provide DHS-USCIS an indication of United States citizenship, if available.

For other SAVE use cases including those for non-voter registration or list maintenance benefit eligibility checks, USCIS may use a full or partial SSN to acquire from SSA an Alien Registration Number (ARN) to access the necessary DHS records within SAVE.

After SAVE checks the SSA and USCIS-accessed databases, DHS-USCIS sends a response to the User Agency in SAVE indicating the individual's citizenship or immigration status, with a code of admission and a narrative description or that additional information is needed to complete the verification (called additional verification). If DHS-USCIS is unable to complete the verification, SAVE will indicate that no record was found and to resubmit with more information as a retry to verify the individual's citizenship or immigration status. In scenarios where a DHS enumerator was provided and unable to provide a verification at initial response, SAVE will request additional verification with documents and try again to resolve the case through a manual review process.

Description of Matched Records

Systems of Records

SSA will disclose to USCIS data from the Enumeration System, 60-0058.

USCIS will maintain information provided by SSA in its system of records entitled, “DHS/U.S. Citizenship and Immigration Services (USCIS)-004 Systematic Alien Verification for Entitlements (SAVE) Program System of Records.”

Specified Data Elements

1. USCIS will provide SSA with the individual’s name, including other names used as applicable, date of birth, and either the full or partial SSN.
2. SSA will provide USCIS a “verified” or “not verified” response and in the case of a “not verified” response, the reason for the “not verified” will be provided. In rare circumstances, SSA is unable to disclose the reason why an SSN did not verify. In these cases, SSA will provide a reason of “other”.
3. SSA’s responses will contain the following:
 - SSN Match (True/False)
 - Full SSN for all matches (when a partial SSN is provided)
 - Name Match (True/False)
 - Date of Birth Match (True/False)
 - Citizenship/Foreign Indicator
 - Blank – Citizenship code is blank and foreign-born indicator is blank
 - * - Citizenship code is blank and foreign-born indicator is *
 - "A" - U.S. Citizen
 - "B" - Legal alien, eligible to work
 - "C" - Legal alien, not eligible to work
 - "D" - Other
 - "E" - Alien Student - restricted work authorized
 - "F" - Conditionally legalized alien
 - Alien Registration Number (where applicable)
 - Death Indicator (Yes Deceased / Not Deceased)
 - Error code descriptions (transaction and record levels)

SSA’s Responsibilities:

Under DHS-USCIS’ SAVE process SSA will provide electronic response codes to USCIS’ SAVE queries. These codes report which data elements sent to SSA by SAVE (name, SSN, and date of birth) match data elements in the Enumeration System. The codes also report if there is a death or fraud indicator in the Enumeration System and the person’s citizenship status, as recorded in the Enumeration System.

SSA will provide responses to the SAVE queries within one second or less.

SSA will inform USCIS when its systems have a scheduled outage or planned maintenance that may negatively affect service.

SSA will safeguard any personally identifiable information (PII) obtained from SAVE agencies through the SAVE process in accordance with the Privacy Act (5 U.S.C. § 552a), the Social Security Act (42 U.S.C. § 1306(a)), and SSA regulations (20 C.F.R. Part 401). SSA will limit access to this information to SSA employees involved in resolving SAVE cases, USCIS employees who administer SAVE, and individuals or entities authorized by the U.S. Government to evaluate SAVE.

USCIS' Responsibilities:

USCIS will only submit verification requests to SSA for authorized purposes.

USCIS will notify SSA of any pending or final changes in the statutory or regulatory requirements concerning SAVE.

USCIS will inform SSA if the SAVE system or other related connectivity system has a scheduled outage or planned maintenance that may negatively affect service.

After discovering a connectivity issue that may negatively affect SAVE service, USCIS will inform SSA.

USCIS will safeguard any PII obtained from SSA in accordance with the Privacy Act (5 U.S.C. § 552a) and the Federal Information Security Modernization Act. SSA will limit access to this information to SSA employees involved in resolving SAVE cases, USCIS employees who administer SAVE, and individuals or entities authorized by the U.S. Government to evaluate SAVE.

Records Usage, Duplication and Redisclosure

The parties acknowledge that information sent by USCIS to SSA for verification requests will be matched against existing SSA- accessed data holdings which may contain the same information. As such, the information provided about an individual within a verification request by USCIS to SSA will not be considered SSA-owned information. Information that identifies a verification request as being generated by USCIS or associated with a USCIS program will be protected as set forth in this Agreement and as required by law.

USCIS and SSA agree to the following limitations on the access to, and disclosure and use of information that identifies a verification request as being generated by USCIS or associated with an USCIS program:

Data or information that identifies a verification request as being generated by USCIS or associated with a USCIS program will remain information owned by USCIS.

USCIS will use the verification responses generated by SSA only for the purposes described in this Agreement.

Data or information that identifies a verification request as being generated by USCIS or associated with a USCIS program will be used only as provided in this Agreement by SSA.

Data or information that identifies a verification request as being generated by USCIS or associated with a USCIS program provided by SSA will not be duplicated or disseminated outside SSA without prior written approval from USCIS. USCIS will not give such approval unless the redisclosure is required by law or is essential to the conduct of the exchange. In such cases, SSA, the agency redisclosing the records, must specify in writing what records will be redisclosed, to whom they will be redisclosed, and the reasons that justify redisclosure.

USCIS will not duplicate or disseminate the verification responses for a purpose not covered by this Agreement, within or outside of its agency, without the written permission of SSA, excepted as required by Federal law. SSA will not give such permission, unless Federal law requires disclosure or disclosure is essential to the purpose of this Agreement. For such permission, USCIS must specify in writing what data it is requesting to duplicate or disseminate and to whom, and the reasons that justify such duplication or dissemination.

All USCIS verification requests will be documented in a transactional database. The retention period is 10 years. The database is not accessible to the public, except as permitted by law.

USCIS and SSA recognizes that they may need to disclose information pursuant to an audit by appropriate government oversight authorities. In the event USCIS or SSA needs to disclose information that identifies a verification request or a verification response covered by this Agreement for purposes of appropriate government oversight, the audited agency shall endeavor to coordinate with source agency in writing in advance of such dissemination, to the extent practicable and consistent with applicable law and policy. USCIS and SSA will take steps to ensure that any disclosures taken in these circumstances are limited to information that is relevant and necessary for the identified purpose.

Security Procedures

SSA and USCIS will comply with the Federal Information Security Management Act (FISMA), 44 U.S.C. § 3551 et seq., as amended by the Federal Information Security Modernization Act of 2014 (Pub. L. 113-283); FIPS, Mandatory Security Processing Standards 199 & 200; related OMB circulars and memoranda, including revised Circular A-130, Management of Federal Information Resources (July 28, 2016); National Institute of Standards and Technology (NIST) directives; and the Federal Acquisition Regulations (FAR). These laws, regulations, and directives provide requirements for safeguarding Federal information systems and PII used in Federal agency business processes, as well as related reporting requirements.

FISMA requirements apply to all Federal contractors, organizations, or sources that possess or use Federal information, or that operate, use, or have access to Federal information systems on behalf of an agency. Each agency receiving information under this DSA is responsible for oversight and compliance of its contractors and agents with FISMA requirements.

Loss Reporting

If either SSA or USCIS experiences an incident involving the loss or breach of PII provided by SSA or USCIS under the terms of this agreement, they will follow the incident reporting guidelines issued by the OMB. In the event of a reportable incident under OMB guidance involving PII, the agency experiencing the incident is responsible for following its established procedures, including notification to the proper organizations (e.g., United States Computer Emergency Readiness Team, the agency's privacy office). In addition, the agency experiencing the incident (e.g., electronic or paper) will notify the other agency's Systems Security Contact named in this agreement. If USCIS is unable to speak with the SSA Breach Contact within one hour or if for some other reason notifying the SSA Systems Security Contact is not practicable (e.g., it is outside of the normal business hours), USCIS will call SSA's National Network Service Center toll free at [REDACTED].

If SSA experiences or suspects that there is a loss or breach of USCIS information, it will notify the USCIS Security Operations Center (SOC) at [REDACTED] and will follow up with an email to USCIS SOC [REDACTED] and the USCIS Office of Privacy ([REDACTED]) within one hour of suspecting or confirming an incident.

Breach Notification

SSA and USCIS will follow PII breach notification policies and related procedures issued by OMB. If the agency that experienced the breach determines that the risk of harm requires notification to affected individuals or other remedies, that agency will carry out these remedies without cost to the other agency.

Administrative Safeguards

SSA and USCIS will restrict access to the data matched and to any data created by the match to only those users, e.g., employees, contractors, etc., who need it to perform their official duties in connection with the uses of the data authorized in this agreement. Further, SSA and USCIS will advise all personnel with access, the confidential nature of the data, the safeguards required to protect the data, and the civil and criminal sanctions for noncompliance contained in the applicable Federal laws.

Parties, including all personnel with access to the information, will be appropriately educated and trained regarding the proper handling of PII and proper care of the information systems to ensure the overall safeguarding and security of the information. SSA and USCIS will ensure that its employees, including contractors with the access to any of the information, have completed privacy training on the handling of PII which includes

information on applicable laws, regulations, and policies related to information privacy and security.

Physical Safeguards

SSA and USCIS will store the data matched and any data created by the match in an area that is physically and technologically secure from access by unauthorized persons during duty hours as well as non-duty hours or when not in use (e.g., door locks, card keys, biometric identifiers, etc.). Only authorized personnel will transport the data matched and any data created by the match. SSA and USCIS will establish appropriate safeguards for such data, as determined by a risk-based assessment of the circumstances involved.

Technical Safeguards

SSA and USCIS will process the data matched and any data created by the match under the immediate supervision and control of authorized personnel in a manner that will protect the confidentiality of the data, so that unauthorized persons cannot retrieve any data by computer, remote terminal, or other means. Systems personnel must enter personal identification numbers when accessing data on the agencies' systems. SSA and USCIS will strictly limit authorization to those electronic data areas necessary for the authorized analyst to perform his or her official duties.

Application of Policy and Procedures

SSA and USCIS will adopt policies and procedures to ensure that each agency uses the information contained in their respective records or obtained from each other solely as provided in this agreement. SSA and USCIS will comply with these guidelines and any subsequent revisions.

Onsite Inspection

NIST Special Publication 800-37, Revision 2, encourages agencies to accept each other's security assessments in order to reuse information system resources and/or to accept each other's assessed security posture in order to share information.

NIST 800-37 further encourages that this type of reciprocity is best achieved when agencies are transparent and make available sufficient evidence regarding the security state of an information system so that an authorizing official from another organization can use that evidence to make credible, risk-based decisions regarding the operation and use of that system or the information it processes, stores, or transmits. Consistent with that guidance, the parties agree to make available to each other upon request system security evidence for the purpose of making risk-based decisions. Requests for this information may be made by either party at any time throughout the duration or any extension of this agreement.

Retention and Destruction of Information

USCIS will destroy the response file generated through this data exchange as soon as the information has served the matching program purpose and all legal retention requirements established in conjunction with the National Archives and Records Administration under applicable procedures have been met. In case of such retention for evidentiary purposes, USCIS will retire the retained data in accordance with the applicable Federal Records Retention Schedule (44 U.S.C. § 3303a).

The information provided by USCIS is not used by SSA for any purpose other than data exchange. USCIS's electronic request files are a transitory nature, or 'transitory records', specifically 'intermediate input files' as defined in General Records Schedule 5.2, Item 010. SSA will protect transitory records in the same manner that it protects SSA records. The Input/Tickler file will be destroyed when no longer needed for business use.

Duration of Agreement

This agreement shall be effective upon the signature of the last signatory hereto and shall continue in effect until and unless modified or terminated in accordance with the provisions of this Agreement.

Modification and Termination

Modifications to this Agreement must be in writing and agreed to by the parties.

This Agreement may be terminated by either party upon 30 days advance written notice.

If legislation is enacted that affects SAVE functions or provides for new functionality, the parties agree to modify this Agreement as appropriate to cover any new provisions.

Contacts:

USCIS Contacts:

David M. Jennings
Associate Chief - Business & Technology Integration
Verification Division (VER)
Immigration Records and Identity Services (IRIS)
U.S. Citizenship and Immigration Services (USCIS)
Department of Homeland Security (DHS)



USCIS Security Operations Center (SOC)
phone: [REDACTED]
[REDACTED]

SSA Contacts

Breach Reporting

Andrea Huseth, Division Director
Office of Privacy and Disclosure
Office of the General Counsel
6401 Security Boulevard
Baltimore, MD 21235
Telephone: [REDACTED]
Email: [REDACTED]

Disclaimers

SSA is not liable for any damages or loss resulting from errors in information provided to USCIS under this Agreement. Furthermore, SSA is not liable for damages or loss resulting from the destruction of any materials or data provided by USCIS. All information furnished to USCIS will be subject to the limitations and qualifications, if any, transmitted with such information. If, because of any such error, loss, or destruction attributable to SSA, the services must be re-performed by SSA, the additional cost thereof will be treated as a part of the full costs incurred in compiling and furnishing such information and will be paid by USCIS.

USCIS is not liable for any damages or loss resulting from errors in SSA information provided to USCIS under this Agreement. All information furnished to SSA will be subject to the limitations and qualifications, if any, transmitted with such information. If, because of any such error, loss, or destruction attributable to SSA, the services must be re-performed by SSA, the additional cost thereof will not be treated as a part of the full costs incurred in compiling and furnishing such information and will not be paid by USCIS.

The performance or delivery by SSA of the goods and/or services described herein and the timeliness of said delivery are authorized only to the extent that they are consistent with proper performance of the official duties and obligations of SSA. If for any reason SSA delays or fails to provide services, or discontinues the services or any part thereof, SSA is not liable for any damages or loss resulting from such delay or for any such failure or discontinuance.

The performance or delivery by USCIS of the goods and/or services described herein and the timeliness of said delivery are authorized only to the extent that they are consistent with proper performance of the official duties and obligations of USCIS. If for any reason USCIS delays or fails to provide services, or discontinues the services or any part thereof, USCIS is not liable for any damages or loss resulting from such delay or for any such failure or discontinuance.

Integration

This Agreement, and the attached system map constitute the entire Agreement of the parties with respect to its subject matter and supersede all other agreements between the parties regarding its subject matter.

There have been no representations, warranties, or promises made outside of this Agreement. This Agreement shall take precedence over any other documents that may be in conflict with it.

Resolution Mechanism

Disagreements on the interpretation of the provisions of this MOA that cannot be resolved between USCIS and the SSA point of contact should be provided in writing to the authorized officials at both agencies for resolution. If settlement cannot be reached at this level, the disagreement will be elevated to the next level in accordance with DHS- USCIS procedures for final resolution.

Authorizing Signatures and Dates

The signatories below warrant and represent that they have the competent authority on behalf of their respective agencies to enter into the obligations set forth in this Agreement.

Electronic Signature Acknowledgement: The signatories may sign this document electronically by using an approved electronic signature process. By signing this document electronically, the signatories agree that the signature they provide has the same meaning and legal validity and effect as a handwritten signature.

Social Security Administration

Sean Brune

Digitally signed by Sean Brune
Date: 2025.05.15 08:58:24
-04'00'

Sean Brune
Assistant Deputy Commissioner,
Office of Mission Support
Social Security Administration

Date: _____

U.S. Department of Homeland Security

**BRIAN J
BRODERICK**

Digitally signed by BRIAN J BRODERICK
Date: 2025.05.15 10:09:48 -04'00'

Brian J. Broderick
Chief (Acting), Verification Division
U.S. Citizenship and Immigration Services

Date: _____

Bulk Case Upload Capability Available for Voter Registration and/or Voter List Maintenance



From: SAVE USCIS <SAVE.USCIS@messages.dhs.gov>

Subject: Bulk Case Upload Capability Available for Voter Registration and/or Voter List Maintenance



Bulk Case Upload Capability Available for Voter Registration and/or Voter List Maintenance

Following Executive Order 14248, "Preserving and Protecting the Integrity of American Elections," USCIS is modernizing SAVE's voter verification services to include a bulk upload capability to create cases. This tool will only be accessible to registered SAVE agencies with legal authority to verify citizenship for voter registration, voter list maintenance, or both as outlined in their Memorandum of Agreement (MOA) with SAVE. Data required for cases entered through the bulk upload tool will mirror the existing SAVE system, however DHS enumerators will be limited to Alien Number and/or Citizenship or Naturalization Certificate Number. This is the first of multiple improvements that USCIS will be initiating in the SAVE System. Future updates will include the ability to submit a case in SAVE for voter verification purposes with other enumerators, such as a Social Security Number (SSN).

To simplify the upload process, SAVE will provide a template with required fields in a standardized data format. Any cases created in SAVE by state agencies individually or in bulk for voter registration or voter list maintenance will be exempt from SAVE transaction fees.

Note that user agencies must institute SAVE additional verification, when required by SAVE, in any voter verification case that does not initially verify as a naturalized or acquired citizen. If SAVE does not verify the case as a naturalized or acquired citizen after additional verification, the user agency is required to contact the individual to obtain proof of citizenship and provide the individual with an opportunity to contact DHS to correct their records prior to a final decision, as well as with any other rights available to the individual under state or other applicable law.

For additional information regarding SAVE's voter verification services, please review the [Voter Registration and Voter List Maintenance Fact Sheet](#). Additionally, users with permission to access this tool will also be able to access the [SAVE Bulk Upload Tool Instructional Guide](#) to enable ease of use.

Please do not reply to this message.



Bulk Case Upload Capability Available for Voter Registration and/or Voter List Maintenance

From: SAVE USCIS <SAVE.USCIS@messages.dhs.gov>

Subject: Bulk Case Upload Capability Available for Voter Registration and/or Voter List Maintenance

**MEMORANDUM OF AGREEMENT****BETWEEN THE DEPARTMENT OF HOMELAND SECURITY,
U.S. CITIZENSHIP AND IMMIGRATION SERVICES
AND****[INSERT FEDERAL USER AGENCY]****I. PARTIES.**

The parties to this Systematic Alien Verification for Entitlements (SAVE) Memorandum of Agreement (MOA) are the Department of Homeland Security, U.S. Citizenship and Immigration Services (DHS-USCIS) and the **Insert User Agency** (User Agency).

II. AUTHORITY.

The authorities governing this MOA include, but are not limited to, the following:

- Immigration Reform and Control Act of 1986, Pub. L. No. 99-603, 100 Stat. 3359, as amended.
- Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Pub. L. No. 104-193, 110 Stat. 2105, as amended.
- Illegal Immigration Reform and Immigrant Responsibility Act of 1996, Pub. L. No. 104-208, 110 Stat. 3009, as amended.
- The Privacy Act of 1974, 5 U.S.C. § 552a, as amended.
- The Economy Act, 31 U.S.C. § 1535, as amended.

Additionally, the authorities governing this MOA that are specific to User Agency's request to use SAVE, include but are not limited to the following:

- **Cite to specific provisions of the legal authority governing the benefit and any other applicable regulatory or statutory provisions that apply.**

Based on a determination and findings, and in accordance with the authority of the Economy Act (31 U.S.C. 1535), as implemented in subpart 17.5 of the Federal Acquisition Regulation, the User Agency certifies that it is entering into this MOA with DHS-USCIS because (1) the services provided under this MOA cannot be obtained as conveniently or economically by contracting directly with a private source, and (2) that this MOA is in the best interest of the Government.

III. PURPOSE.



The purpose of this MOA is to establish the terms and conditions for the User Agency's participation¹ in SAVE to verify the U.S. citizenship and immigration status information of individuals (applicants) applying for:

- ***Insert Benefit(s)/License(s)*** (benefit).

SAVE verifies User Agency-provided information against DHS-accessed records, including immigration, naturalization and acquired citizenship records using an immigration enumerator issued by DHS (immigration enumerator) or other government issued enumerator(s) permitted by SAVE. SAVE may only be able to verify acquired U.S. citizens in certain situations.²

SAVE will provide information to the User Agency by:

- 1) Initial response (initial verification) to an on-line inquiry by the User Agency; and
- 2) Additional verification procedures, where applicable.

IV. RESPONSIBILITIES.

A. DHS-USCIS agrees to:

- (1) Provide to the User Agency, in a manner determined by DHS-USCIS, an immigration status and U.S. citizenship information verification process under SAVE;
- (2) Respond to properly submitted verification requests from the User Agency by providing the limited information noted in the **PURPOSE** section above;
- (3) Process and respond to properly submitted additional verification requests³ from the User Agency. Response time to complete additional verification requests may vary depending upon DHS-USCIS workload, available resources, and the applicant's specific circumstances;
- (4) Provide to the User Agency operating instructions necessary for the User Agency to designate users within the purview of the User Agency;

¹ "Participation" in SAVE is as described in the DHS/USCIS/SAVE Privacy Impact Assessment - 006. See [Systematic Alien Verification for Entitlements \(SAVE\) Program | Homeland Security \(dhs.gov\)](#).

² "Acquired citizenship" is defined as citizenship conveyed to children through the naturalization of parents or, under certain circumstances, at birth to foreign-born children of U.S. citizens, provided certain conditions are met. SAVE is only able to verify information that relates to information found in the databases accessed by the system. Accordingly, if the User Agency provides an immigration enumerator for an individual with acquired citizenship who has not applied for a Certificate of Citizenship with USCIS, the agency may not have that individual's citizenship information available in the databases accessed, and SAVE may not be able to confirm that individual's acquired citizenship.

³ "Additional verification" is as described in the DHS/USCIS/SAVE Privacy Impact Assessment - 006. See [Systematic Alien Verification for Entitlements \(SAVE\) Program | Homeland Security \(dhs.gov\)](#).



- (5) Provide to the User Agency SAVE point of contact information for questions or problems regarding the User Agency's participation in SAVE;
- (6) Provide access to training and information regarding the laws, policies, and procedures that govern verifying, safeguarding, using, maintaining, and disclosing certain citizenship and immigration status information;
- (7) Provide the User Agency access to additional verification processes with requirements identified by SAVE;
- (8) Recover no more than its actual costs. SAVE transaction charges are found on the SAVE website. SAVE transaction charges and methods of payment are subject to change upon prior written notification to the User Agency;
- (9) Bill and collect reimbursements for SAVE usage through the Intra-governmental Payment and Collection (IPAC) system using G-Invoicing. DHS-USCIS will provide documentation supporting all charges to the User Agency's IPAC POC specified in writing by the User Agency. The User Agency's SAVE High Level Identifier, the Agency Locator Codes, appropriate accounting code(s), and associated dollar amounts will be referenced on all IPAC transactions;
- (10) Not assess the User Agency for any prompt payment interest; and
- (11) Promptly initiate year-end and closeout adjustments once final costs are known.

B. User Agency agrees to:

(1) SAVE System Use.

- (a) Verify the identity of each applicant and require each applicant to present their immigration or U.S. citizenship documentation that contains the information required by SAVE, including immigration enumerator (e.g., A-number / USCIS number) or other enumerator permitted for use by SAVE;
- (b) Examine the documentation presented by the applicant, physically or using a process authorized by SAVE to examine verifiable digital credentials (e.g., mobile driver's license), and ensure that the document(s) reasonably appear(s) to be genuine and relates to the individual;
- (c) Provide the necessary information in the manner SAVE requires to respond to User Agency requests for verification of immigration status or U.S. citizenship information.

The following information from the applicant required to create and submit a request for initial automated verification:

- First name and last name;
- Date of birth; and



- At least one of the following:
 - A DHS issued or certain DOS issued immigration enumerator (e.g., A-Number/USCIS Number, SEVIS ID, I-94 Number, Naturalization / Citizenship Certificate Number, Card Number / I-797 Receipt Number, or Visa Number); or
 - Other government issued enumerator permitted by SAVE.

SAVE may modify requirements for SAVE cases and will provide written notification (e.g., by e-mail or update to SAVE website) to User Agency of any changes. Only enumerators accepted in SAVE can be submitted for verification.

Cases submitted for additional verification may require different enumerators than what the User Agency used to create the SAVE case and submit for initial verification. User Agency will only submit requests for additional verification using enumerators permitted by SAVE. Additional information obtained from the applicant's immigration or citizenship documentation may be required for additional verification. Scanned documents and other electronically submitted information may also be required for additional verification.

User Agency consents to electronic-only submission of all verification requests and additional information, including all information submitted for SAVE additional verification. SAVE will reject non-electronic (i.e., paper or fax) verification requests and information submissions;

(d) Ensure and report to DHS-USCIS that, before using SAVE and whenever subsequently required by DHS-USCIS (e.g., for SAVE system enhancements), all users performing verification procedures complete SAVE-required training including: reviewing the SAVE Program Guide, taking the latest version of SAVE tutorial(s) and maintaining a working knowledge of requirements contained therein and in this MOA, as updated;

(e) Ensure users are provided with, maintain, and use SAVE user IDs and access SAVE only while they need to perform verification procedures and promptly terminate user access when requested by SAVE, or if the user separates from the User Agency or otherwise no longer needs SAVE access;

(f) Ensure all users performing verification procedures only use SAVE with respect to verification of immigration status and U.S. citizenship of applicants for the benefit specified in *Section III. Purpose* of the MOA and comply with all other requirements contained in the SAVE Program Guide and other SAVE guidance, the SAVE tutorial, and this MOA, and updates to these requirements;

(g) Ensure that all users performing verification procedures have contact information for SAVE and DHS-USCIS;



- (h) Ensure all users perform any additional verification procedures SAVE requires and/or the applicant requests after the User Agency initiates a verification request. User Agency cannot deny a benefit based on a SAVE response where additional action is required of the User Agency by SAVE or additional verification is requested by the applicant but has not been completed;
- (i) Use any information provided by DHS-USCIS under this MOA solely for the purpose of determining the eligibility of persons applying for the benefit issued by the User Agency as described in *Section III. Purpose* of the MOA, and limit use of such information in accordance with this and all other provisions of this MOA;
- (j) Comply with the requirements of the Federal Information Security Modernization Act of 2014 (Pub. L. No. 113-283, as amended) and OMB guidance as applicable to access, electronic storage, transport of records between agencies, and the internal processing of records received by either agency under the terms of this MOA;
- (k) Maintain physical, administrative, and technical safeguards for SAVE information and access methods to ensure that it is not used for any other purpose than described in this MOA and protect its confidentiality; including ensuring that it is not disclosed to any unauthorized person(s) without the prior written consent of DHS-USCIS;⁴
- (l) Comply with the Privacy Act of 1974, 5 U.S.C. § 552a, as amended, and other applicable laws, regulations, and policies, including, but not limited to, all OMB and DHS privacy guidance, in conducting verification procedures pursuant to this MOA, and in safeguarding, maintaining, and disclosing any data provided or received pursuant to the MOA. Information shared as a result of this MOA shall be considered DHS-USCIS information. Responses to third party requests for such information should be consistent with federal law and DHS policy, including but not limited to the provisions of the Freedom of Information Act, 5 U.S.C. § 552;
- (m) Administer SAVE verification in a manner that does not unlawfully discriminate against applicants on any protected basis, including sex, color, race, religion, national origin, disability, or age. In accordance with the Rehabilitation Act of 1973, as amended, and related agency implementing regulations, User Agency will provide reasonable modifications for individuals with disabilities to ensure effective communication;
- (n) Provide all benefit-applicants who are denied benefits based solely or in part on the SAVE response with adequate written notice of the denial and the information necessary to contact DHS (*see* SAVE Records Fast Facts For Benefit Applicants, available on the SAVE and USCIS websites) so that such individual may correct their immigration records in a timely manner, if necessary. Benefit applicants may need to correct their records with other government agencies depending on the error;

⁴ Each applicant seeking access to information regarding themselves may do so by submitting a written signed request to DHS-USCIS. Instructions for submitting such requests may be found on the Freedom of Information/Privacy Act page of www.uscis.gov.



(o) Provide all benefit-applicants who are denied benefits based solely or in part on the SAVE response with the opportunity to use the User Agency's existing process to appeal the denial and to contact DHS-USCIS to correct their immigration records and/or any government agency where records correction is required, prior to a final decision, if necessary; and

(p) Refrain from using SAVE, or assisting any person or entity, to comply with the employment eligibility verification requirements of section 274A of the Immigration and Nationality Act, 8 U.S.C. Section 1324a.

(2) Account Compliance.

(a) Provide DHS-USCIS with the current e-mail, U.S. postal service address, physical address, name and telephone number of the User Agency authorized representative for any notifications, questions or problems that may arise in connection with the User Agency's participation in SAVE and with notification of changes in the benefit offered by the User Agency;

(b) Notify DHS-USCIS immediately whenever there is reason to believe a violation of this MOA has occurred;

(c) Notify DHS-USCIS immediately whenever there is reason to believe a breach of personally identifiable information has occurred as a result of User Agency action or inaction pursuant to OMB Memorandum M-17-12, "Preparing for and Responding to a Breach of Personally Identifiable Information" or successor guidance;

(d) Allow DHS-USCIS to monitor and review all records and documents related to the use, abuse, misuse, fraudulent use or improper use of SAVE by the User Agency, including, but not limited to, original applicant consent documents required by the Privacy Act, 5 U.S.C. Section 552a, or other applicable authority;

(e) Allow DHS-USCIS to conduct desk audits and/or site visits to review User Agency's compliance with this MOA and all other SAVE-related policies, procedures, guidance and laws applicable to conducting verification and safeguarding, maintaining, and disclosing any data provided or received pursuant to this MOA;

(f) Allow DHS-USCIS to perform audits of User Agency's user IDs use and access, SAVE Training Records, SAVE financial records, SAVE biographical information, system profiles and usage patterns and other relevant data;

(g) Allow DHS-USCIS to interview any and all User Agency SAVE system users and any and all contact persons or other personnel within the User Agency regarding any and all questions or problems which may arise in connection with the User Agency's participation in SAVE;



(h) Allow DHS-USCIS to monitor system access and usage and to assist SAVE users as necessary to ensure compliance with the terms of this MOA and SAVE requirements by its authorized agents or designees; and

(i) Take corrective measures in a timely manner to address all lawful requirements and recommendations on every written finding including, but not limited to, those of DHS-USCIS regarding waste, fraud, and abuse, and discrimination or any misuse of the SAVE system or SAVE data, non-compliance with the terms, conditions and safeguards of this MOA, SAVE procedures or other applicable law, regulation or policy.

(3) Reimbursement.

(a) The User Agency certifies that, each fiscal year, it will obligate funds sufficient to reimburse DHS-USCIS under a current appropriation for the coming year.

(b) Pay the transaction charges reflected on the SAVE website, which along with methods of payment are subject to change upon prior written notification to the User Agency.

(c) Pay in full within 30 days of the end of the quarter for which it incurs the expense. Failure to timely pay may result in suspension or termination of services. Treasury Financial Manual, Appendix 5, will govern any payment disputes.

V. POINTS OF CONTACT.

USCIS SAVE

U.S. Citizenship and Immigration Services, Department of Homeland Security

Attn: SAVE Operations

5900 Capital Gateway Drive, Mail Stop 2620

Camp Springs, MD 20588-0009

Phone: (877) 469-2563

E-mail: SAVE.help@uscis.dhs.gov

USER AGENCY

Insert Agency Name

Insert Title

Insert Address Line 1

Insert Address Line 2

Phone: [Insert Number] E-mail: [Insert Email Address]

VI. OTHER PROVISIONS.

A. MOA Responsibilities. Consistent with applicable laws, regulations, and policies, and the availability of User Agency resources, User Agency will commit personnel and resources sufficient to support this MOA. Only authorized employees, agents, or designees of DHS-USCIS and the User Agency will carry out the requirements of this MOA. In carrying out these responsibilities, they will operate within the scope of



applicable regulations, specifically delegated authorities, the program authorities and funding limitations and terms and conditions of this MOA.

B. Determining Benefit Eligibility. This MOA is limited to the provision of verification services. DHS-USCIS will verify limited citizenship and immigration status information, but will not recommend to the User Agency whether to issue the benefit. The DHS-USCIS response is not intended to be, and should not be construed as, an opinion on the part of DHS-USCIS or the United States regarding any right or benefit under any program administered by the User Agency. The User Agency has the responsibility to determine the applicant's eligibility for the benefit.

C. Criminal Penalties.

(1) DHS-USCIS reserves the right to use information from the User Agency for any purpose permitted by law, including, but not limited to, the prosecution of violations of Federal administrative or criminal law.

(2) The User Agency acknowledges that the information it receives from DHS-USCIS is governed by the Privacy Act, 5 U.S.C. Section 552a(i)(1), and that any person who obtains this information under false pretenses or uses it for any purpose other than as provided for in this MOA may be subject to criminal penalties.

D. Third Party Liability.

(1) Each party to this MOA shall be solely responsible for its own defense against any claim or action by third parties arising out of or related to the execution and/or performance of this MOA, whether civil or criminal, and retain responsibility for the payment of any corresponding liability.

(2) Nothing in this MOA is intended, or should be construed, to create any right or benefit, substantive or procedural, enforceable at law by any third party against the United States, its agencies, officers, or employees or the User Agency.

E. Disputes. Disagreements on the interpretation of the provisions of this MOA that cannot be resolved between SAVE and the User Agency point of contact should be provided in writing to the authorized officials at both agencies for resolution. If settlement cannot be reached at this level, the disagreement will be elevated to the next level in accordance with DHS-USCIS procedures for final resolution.

F. Conflicts. This MOA constitutes the full MOA on this subject between DHS-USCIS and the User Agency. Any inconsistency or conflict between or among the provisions of this MOA, will be resolved in the following order of precedence: (1) this MOA and (2) other documents incorporated by reference in this MOA (e.g., transaction charges).

G. Severability. Nothing in this MOA is intended to conflict with current law or regulation or the directives of DHS, DHS-USCIS, or the User Agency. If a term of this



MOA is inconsistent with such authority, then that term shall be invalid but, to the extent allowable, the remaining terms and conditions of this MOA shall remain in full force and effect. In the event of a conflict that prevents either party from fulfilling its obligations, this MOA may be immediately canceled without providing the 30-day notice period referenced in Section IX.

H. Assignment. The User Agency may not assign this MOA, nor may it assign any of its rights or obligations under this MOA. To the extent allowable by law, this MOA shall inure to the benefit of, and be binding upon, any successors to DHS-USCIS and the User Agency without restriction.

I. Waiver. No waiver by either party of any breach of any provision of this MOA shall constitute a waiver of any other breach. Failure of either party to enforce at any time, or from time to time, any provision of this MOA shall not be construed to be a waiver thereof.

VII. EFFECTIVE DATE.

This MOA shall be effective when the DHS-USCIS authorized official and User Agency authorized official have both signed the MOA. This MOA shall continue in effect until and unless modified or terminated in accordance with the provisions of this MOA.

VIII. MODIFICATION.

A. This MOA is subject to periodic review by DHS-USCIS, its authorized agents or designees, and, if necessary, periodic modification and/or renewal to assure compliance with current law, policy, and standard operating procedure(s). This MOA constitutes the complete MOA between the parties for its stated purpose, and no modification or addition will be valid unless entered into by mutual consent of both parties evidenced in writing and signed by both parties and appended to this agreement.

B. DHS-USCIS may accomplish unilateral administrative modifications to revise transaction charges and methods of payment, effective upon prior written notification to the User Agency. Either party may accomplish a unilateral administrative modification to change POC information. A written bilateral modification (i.e., agreed to and signed by authorized officials of both parties) is required to change any other term of this MOA.

IX. TERMINATION.

Either party may terminate this MOA at any time by providing 30 days written notice of intent. DHS-USCIS and User Agency, when feasible, will consult with the other party and attempt to reconcile issues before terminating this MOA. Notwithstanding any other provision in the MOA, DHS-USCIS may suspend or terminate this MOA, and thereby the Agency's use of SAVE, without prior notice if deemed necessary because of a requirement of law or policy, upon a determination by DHS-USCIS that there has been a breach of system integrity or security by the User Agency or a failure by the User Agency



to comply with established procedures or legal requirements, including, but not limited to, failure to pay.

Written notices shall be sent to the addresses of the POCs listed herein and shall be effective upon receipt. Either party may change its POC by written notice to the other party.

The foregoing, including all references, constitutes the full agreement on this subject between DHS-USCIS and the User Agency. This MOA supersedes all previous agreements governing the provision of verification services. Those agreements are explicitly acknowledged to be null and void.

The undersigned represent that they are authorized to enter into this MOA on behalf of DHS-USCIS and the User Agency, respectively.

Brian J. Broderick
(Acting) Chief, Verification Division
U.S. Citizenship and Immigration
Services
Department of Homeland Security

[Signatory Name User Agency]
[Signatory Title User Agency]
[User Agency Name Line 1]
[User Agency Name Line 2]

Date

Date



MEMORANDUM OF AGREEMENT

**BETWEEN THE DEPARTMENT OF HOMELAND SECURITY,
U.S. CITIZENSHIP AND IMMIGRATION SERVICES
AND
Flagler County Supervisor of Elections
REGARDING PARTICIPATION IN THE SAVE PROGRAM FOR
VOTER REGISTRATION AND VOTER LIST MAINTENANCE PURPOSES**

I. PARTIES.

The parties to this Systematic Alien Verification for Entitlements (SAVE) Memorandum of Agreement (MOA) are the Department of Homeland Security, U.S. Citizenship and Immigration Services (DHS-USCIS), and the **Flagler County Supervisor of Elections** (User Agency).

II. AUTHORITY.

The authorities governing this MOA include, but are not limited to, the following:

- Immigration Reform and Control Act of 1986, Pub. L. No. 99-603, 100 Stat. 3359, as amended.
- Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Pub. L. No. 104-193, 110 Stat. 2105, as amended.
- Section 642 of Div. C, Title VI of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, Pub. L. No. 104-208, 110 Stat. 3009, as amended (8 U.S.C. §1373(c)).
- The Privacy Act of 1974, 5 U.S.C. § 552a, as amended.
- The Inter-Governmental Cooperation Act, 31 U.S.C. § 6501, et seq., as amended.
- The Federal Information Security Management Act of 2014 (Pub. L. 113-283), as amended.
- National Voter Registration Act of 1993, 52 U.S.C. § 20501, Pub. L. No. 103-31, 107 Stat. 77, as amended.
- Help America Vote Act of 2002, 52 U.S.C. § 20901, Pub. L. No. 107-252, § 303, 116 Stat. 1666, as amended.

Additionally, the authorities governing this MOA that are specific to this User Agency's request to use SAVE, include but are not limited to the following:

- **Florida Statutes, Title IX, Chapter 97, §§ 97.041, 97.052, 97.053, 97.073, and Chapter 98, §§ 98.015, 98.035, 98.045, 98.065, 98.075, 98.093. as amended**

Pursuant to the requirements of the Office of Management and Budget (OMB) Circular A-97,



which establishes the President's guidelines for implementing the Intergovernmental Cooperation Act, 31 U.S.C. § 6501, et seq., as amended, the User Agency certifies that it cannot procure the U.S. citizenship information and immigration status information verification services requested pursuant to this MOA reasonably and expeditiously through ordinary business channels.

III. PURPOSE.

The purpose of this MOA is to establish the terms and conditions for the User Agency's participation in SAVE to verify the U.S. citizenship and immigration status information of registrants and registered voters within User Agency's jurisdiction for **voter registration and voter list maintenance** (benefit) in the **Flagler** County of **Florida**.¹

SAVE verifies User Agency-provided information against DHS-accessed records, including immigration, naturalization and acquired citizenship records using an immigration enumerator issued by DHS (immigration enumerator) or other government issued enumerator(s) permitted by SAVE. SAVE may only be able to verify acquired U.S. citizens in certain situations.²

SAVE will provide information to the User Agency by:

- 1) Initial response (initial verification) to an on-line inquiry by the User Agency; and
- 2) Additional verification procedures, where applicable.

IV. RESPONSIBILITIES.

A. DHS-USCIS agrees to:

- (1) Provide to the User Agency, in a manner determined by DHS-USCIS, an immigration status and U.S. citizenship information verification process under SAVE;
- (2) Respond to properly submitted verification requests from the User Agency by providing the limited information noted in the **PURPOSE** section above, i.e., a verification case number and U.S. citizenship or immigration status, if any;

¹ "Participation" in SAVE is as described in the DHS/USCIS/SAVE Privacy Impact Assessment - 006. See [Systematic Alien Verification for Entitlements \(SAVE\) Program | Homeland Security \(dhs.gov\)](#).

² "Acquired citizenship" is defined as citizenship conveyed to children through the naturalization of parents or, under certain circumstances, at birth to foreign-born children of U.S. citizens, provided certain conditions are met. SAVE is only able to verify information that relates to information found in the databases accessed by the system. Accordingly, if the User Agency provides an immigration enumerator for an individual with acquired citizenship who has not applied for a Certificate of Citizenship with USCIS, the agency may not have that individual's citizenship information available in the databases accessed, and SAVE may not be able to confirm that individual's acquired citizenship.



- (3) Process and respond to properly submitted additional verification requests³ from the User Agency. Response time to additional verification requests may vary depending upon DHS-USCIS workload, available resources, and the registrant's or registered voter's specific circumstances;
- (4) Provide to the User Agency operating instructions necessary for the User Agency to designate users within the purview of the User Agency;
- (5) Provide to the User Agency SAVE point of contact information for questions or problems regarding the User Agency's participation in SAVE;
- (6) Provide access to training and information regarding the laws, policies, and procedures that govern verifying, safeguarding, using, maintaining, and disclosing certain citizenship and immigration status information;
- (7) Provide the User Agency access to additional verification processes, with requirements identified by SAVE;
- (8) Recover no more than its actual costs. SAVE transaction charges are found on the SAVE website. SAVE transaction charges and methods of payment are subject to change upon prior written notification to the User Agency;
- (9) Bill and collect reimbursements for transaction fees, if any, charged by SAVE for access and usage by submitting invoices to the User Agency's payment office at the address specified in writing by the User Agency, with a copy furnished to the User Agency POC. DHS-USCIS may submit invoices when the work is completed or as otherwise authorized. The User Agency's High Level Identifier, tax identification number, and associated dollar amounts will be referenced on all invoices; and
- (10) Promptly initiate year-end and closeout adjustments for any final costs once known.

B. User Agency agrees to:

(1) SAVE System Use.

(a) Provide the necessary information in the manner SAVE requires to respond to User Agency requests for verification of immigration status or U.S. citizenship information. The following information from the applicant is required to create and submit a request for initial automated verification:

- First name and last name;
- Date of birth; and
- At least one of the following:

³ "Additional verification" is as described in the DHS/USCIS/SAVE Privacy Impact Assessment - 006. See [Systematic Alien Verification for Entitlements \(SAVE\) Program | Homeland Security \(dhs.gov\)](#).



- A DHS issued citizenship or immigration enumerator (for example, A-Number/USCIS Number, Certificate of Naturalization Number, Certificate of Citizenship Number, I-94 Number, Card Number / I-797 Receipt Number, or SEVIS ID); or
- Other government issued enumerator permitted by SAVE.

SAVE may modify requirements for SAVE cases and will provide written notification (e.g., by e-mail or update to SAVE website) to User Agency of any changes. Only enumerators accepted in SAVE can be submitted for verification.

Cases submitted for additional verification may require different enumerators than what the User Agency used to create the SAVE case and submit for initial verification. User Agency will only submit requests for additional verification using enumerators permitted by SAVE. Additional information obtained from the applicant's immigration or citizenship documentation may be required for additional verification. Scanned documents and other electronically submitted information may also be required for additional verification.

User Agency must request additional verification when required by SAVE for any registrant or registered voter that does not verify as a U.S. citizen on initial verification, including in all cases where the User Agency receives any SAVE response other than that of U.S. citizen. If the User Agency does not request additional verification or SAVE does not verify the registrant or registered voter as a U.S. citizen after conducting additional verification, the User Agency must contact the registrant or registered voter to obtain proof of U.S. citizenship, if necessary under the circumstances to fulfill the purpose of this MOA and in accordance with the provisions of this MOA and Federal and State law.

User Agency consents to electronic-only submission of all verification requests and additional information, including all information submitted for SAVE additional verification. SAVE will reject non-electronic (i.e., paper or fax) verification requests and information submissions.

(b) Ensure and report to DHS-USCIS that, before using SAVE and whenever subsequently required by DHS-USCIS (e.g., for SAVE system enhancements), all users performing verification procedures complete SAVE-required training, including: reviewing the SAVE Program Guide, taking the latest version of SAVE tutorial(s), and maintaining a working knowledge of requirements contained therein and in this MOA, as updated. These instructional materials will address the policies and procedures governing use of the program, including (1) program access, (2) verification procedures, (3) disclosure of information and privacy protections, (4) non-discrimination requirements, and (5) records correction procedures for registrants and registered voters;

(c) Ensure users are provided with, maintain, and use SAVE User IDs and access SAVE only while they need to perform verification procedures and promptly terminate user access when requested by SAVE, or if the user separates from the User Agency or otherwise no longer needs SAVE access;



- (d) Ensure all users performing verification procedures only use SAVE with respect to verification of registrant or registered voter U.S. citizenship information or immigration status information for the specified benefit and comply with all other requirements contained in the SAVE Program Guide and other SAVE guidance, the SAVE tutorial, and this MOA, and updates to these requirements;
- (e) Ensure that all Users performing verification procedures have contact information for SAVE and DHS-USCIS;
- (f) Ensure all users perform any additional verification procedures SAVE requires and/or the registrant or registered voter requests after the User Agency initiates a verification request. User Agency cannot deny a benefit based on a SAVE response where additional action is required of the User Agency by SAVE or additional verification is requested by the applicant but has not been completed;
- (g) Use any information provided by DHS-USCIS under this MOA solely for lawful purposes, namely the purpose above of verifying U.S. citizenship information and immigration status information of registrants and registered voters within User Agency's jurisdiction for determining eligibility for voter registration and to vote in Flagler, and limit use of such information in accordance with this and all other provisions of this MOA;
- (h) Comply with the requirements of the Federal Information Security Modernization Act of 2014 (Pub. L. No. 113-283, as amended) and OMB guidance as applicable to access, electronic storage, transport of records between agencies, and the internal processing of records received by either agency under the terms of this MOA;
- (i) Maintain physical, administrative, and technical safeguards for SAVE information and access methods to ensure that it is not used for any other purpose than described in this MOA and protect its confidentiality, including ensuring that it is not disclosed to any unauthorized person(s) without the prior written consent of DHS-USCIS;⁴
- (j) Comply with the Privacy Act of 1974, 5 U.S.C. § 552a, as amended, and other applicable laws, regulations, and policies, including but not limited to all OMB and DHS privacy guidance, in conducting verification procedures pursuant to this MOA, and in safeguarding, maintaining, and disclosing any data provided or received pursuant to the MOA. Information shared as a result of this MOA shall be considered DHS-USCIS information. Responses to third party requests for such information should be consistent with federal law and DHS policy, including but not limited to the provisions of the Freedom of Information Act, 5 U.S.C. § 552;

⁴ Each registrant or registered voter seeking access to information regarding themselves may do so by submitting a written signed request to DHS-USCIS. Instructions for submitting such requests may be found on the Freedom of Information/Privacy Act page of www.uscis.gov.



(k) Comply with federal laws prohibiting discrimination against registrants or registered voters and discriminatory use of SAVE based upon the national origin, color, race, sex, religion, age, or disability of the registrant or registered voter, including but not limited to the National Voter Registration Act, 52 U.S.C. § 20501 et seq., as amended; the Help America Vote Act, 52 U.S.C. § 20901, as amended; the Voting Rights Act, 52 U.S.C. § 10301 et seq., as amended; and the Civil Rights Act, 52 U.S.C. § 10101 et seq., as amended. In accordance with the Rehabilitation Act of 1973, as amended, and related agency implementing regulations, User Agency will provide reasonable modifications for individuals with disabilities to ensure effective communication;

(l) Comply with the requirements of Executive Order 13166 (“Improving Access to Services for Persons with Limited English Proficiency,” 65 Fed. Reg. 50,121 (Aug. 16, 2000)), to take reasonable steps to provide limited English proficiency (LEP) persons interacting with their respective agency with meaningful access to federally conducted programs and activities, including services and benefits, in accordance with LEP guidance set forth by the U.S. Department of Justice and any other applicable authorities;

(m) Provide written notice to registrants and registered voters that any information they provide may be subject to verification. User Agency will inform in writing each registrant or registered voter covered by this Agreement that their citizenship or immigration status may be verified against federal records;

(n) Provide all registrants or registered voters who are not verified as U.S. citizens based solely or in part on the SAVE response with the opportunity to use the User Agency’s existing process to appeal the denial and to contact DHS-USCIS to correct their immigration records prior to a final decision, if necessary. (Information for how to contact DHS to correct immigration records is available in the SAVE Records Fast Facts for Benefit Applicants on the SAVE and USCIS websites.) Benefit applicants may need to correct their records with other government agencies depending on the error;

(o) Provide or cause to be provided to all individuals with respect to whom User Agency or another agency intends to deny registration or proceed with any removal from a voter roll or other action removing or limiting the right to vote, or with civil or criminal enforcement action, because or based in whole or in part upon any information received pursuant to this MOA, with any right to notice and hearing or other due process available under State or other applicable law;

(p) Refrain from using SAVE, or assisting any person or entity, to comply with the employment eligibility verification requirements of section 274A of the Immigration and Nationality Act, 8 U.S.C. § 1324a.

(2) Account Compliance.

(a) Provide DHS-USCIS with the current e-mail, U.S. postal service address, physical address, name, and telephone number of the User Agency authorized representative for any notifications,



questions or problems that may arise in connection with the User Agency's participation in SAVE and with notification of changes in the use of SAVE by the User Agency;

(b) Notify DHS-USCIS immediately whenever there is reason to believe a violation of this MOA has occurred;

(c) Notify DHS-USCIS immediately whenever there is reason to believe a breach of personally identifiable information has occurred as a result of User Agency action or inaction pursuant to OMB Memorandum M-17-12, "Preparing for and Responding to a Breach of Personally Identifiable Information" or successor guidance;

(d) Allow DHS-USCIS to monitor and review all records and documents related to the use, abuse, misuse, fraudulent use or improper use of SAVE by the User Agency, including, but not limited to original registrant or registered voter consent documents required by the Privacy Act, 5 U.S.C. § 552a or other applicable authority;

(e) Allow DHS-USCIS to conduct desk audits and/or site visits to review User Agency's compliance with this MOA and all other SAVE-related policies, procedures, guidance and laws applicable to conducting verification and safeguarding, maintaining, and disclosing any data provided or received pursuant to this MOA;

(f) Allow DHS-USCIS to perform audits of User Agency's user IDs use and access, SAVE Training Records, SAVE financial records, SAVE biographical information, system profiles and usage patterns and other relevant data;

(g) Allow DHS-USCIS to interview any and all User Agency SAVE system users and any and all contact persons or other personnel within the User Agency regarding any and all questions or problems which may arise in connection with the User Agency's participation in SAVE;

(h) Allow DHS-USCIS to monitor system access and usage and to assist SAVE users as necessary to ensure compliance with the terms of this MOA and SAVE requirements by its authorized agents or designees; and

(i) Take corrective measures in a timely manner to address all lawful requirements and recommendations on every written finding including, but not limited to, those of DHS-USCIS regarding waste, fraud, and abuse, and discrimination or any unauthorized use or misuse of the SAVE system or SAVE data, non-compliance with the terms, conditions and safeguards of this MOA, SAVE procedures or other applicable law, regulation or policy.

(3) Reimbursement.

(a) The User Agency certifies that, each fiscal year, it will obligate funds sufficient to reimburse DHS-USCIS under a current appropriation for the coming year for any anticipated charges.



(b) Pay the transaction charges reflected on the SAVE website, which along with methods of payment are subject to change upon prior written notification to the User Agency.

(c) Pay in full the amount due, if any, within 30 days of the invoice date. The User Agency will pay any applicable sales, use, excise, and like taxes, where required by law, that are stated on each invoice. Regardless of payment type, the User Agency will clearly indicate the User Agency High Level Identifier with remittance; and

(d) Promptly discuss and resolve issues and questions with DHS-USCIS regarding payments. Delinquent payments shall be handled in accordance with the Debt Collection and Improvement Act of 1996, 31 U.S.C. § 3701. Interest on all unpaid balances shall be charged at the rate of the current value of funds to the United States Treasury effective on the date of the invoice. The rate is the Treasury tax and loan rate. It is published annually or quarterly by the Secretary of the Treasury in the Federal Register and the Treasury Fiscal Requirements Manual Bulletins. Handling charges will accrue at monthly rates of \$5.00 for each of the first two months of delinquency and \$10.00 for each month thereafter. In addition to interest and handling charges, if DHS-USCIS does not receive payment within 90 days of the invoice, 6% per annum additional interest will be assessed. Charges will be computed from the date of the invoice and will accrue monthly with the applicable interest and handling charges. In the case of any late payment, the amount received will be applied in this sequence: (1) to any accrued penalty and handling charges; (2) to any accrued interest; and (3) to outstanding principal. Failure to timely pay may result in suspension or termination of services.

V. POINTS OF CONTACT.

USCIS SAVE

U.S. Citizenship and Immigration Services
Department of Homeland Security
Attn: SAVE Operations
5900 Capital Gateway Drive, Mail Stop 2620
Camp Springs, MD 20588-0009
Phone: (877) 469-2563 E-mail: SAVE.help@uscis.dhs.gov

USER AGENCY

Flagler County Supervisor of Elections
Kaiti Lenhart
Supervisor of Elections
PO Box 901
Bunnell, FL 32110
(386)313-4170 klenhart@flaglerelections.gov

VI. OTHER PROVISIONS.

A. MOA Responsibilities. Consistent with applicable laws, regulations, and policies, and the availability of User Agency resources, User Agency will commit personnel and resources



sufficient to support this MOA. Only authorized employees, agents, or designees of DHS-USCIS and the User Agency will carry out the requirements of this MOA. In carrying out these responsibilities, they will operate within the scope of applicable regulations, specifically delegated authorities, the program authorities and funding limitations and terms and conditions of this MOA. The User Agency will also ensure that all local officials responsible for voter registration use information obtained from SAVE and provided by the User Agency in accordance with the terms and conditions of this MOA.

B. Determining Benefit Eligibility. This MOA is limited to the provision of verification services. DHS-USCIS will verify limited citizenship and immigration status information but will not recommend to the User Agency whether to issue the benefit. The DHS-USCIS response is not intended to be, and should not be construed as, an opinion on the part of DHS-USCIS or the United States regarding any right or benefit under any program administered by the User Agency. The User Agency has the responsibility to determine the registrant's or registered voter's eligibility for the benefit.

C. Criminal Penalties.

(1) DHS-USCIS reserves the right to use information from the User Agency for any purpose permitted by law, including, but not limited to, the prosecution of violations of Federal administrative or criminal law.

(2) The User Agency acknowledges that the information it receives from DHS-USCIS is governed by the Privacy Act of 1974, 5 U.S.C. Section 552a(i)(1), and that any person who obtains this information under false pretenses or uses it for any purpose other than as provided for in this MOA may be subject to criminal penalties.

D. Third Party Liability.

(1) Each party to this MOA shall be solely responsible for its own defense against any claim or action by third parties arising out of or related to the execution and/or performance of this MOA, whether civil or criminal, and retain responsibility for the payment of any corresponding liability.

(2) Nothing in this MOA is intended, or should be construed, to create any right or benefit, substantive or procedural, enforceable at law by any third party against the United States, its agencies, officers, or employees or the User Agency.

E. Disputes. Disagreements on the interpretation of the provisions of this MOA that cannot be resolved between SAVE and the User Agency point of contact should be provided in writing to the authorized officials at both agencies for resolution. If settlement cannot be reached at this level, the disagreement will be elevated to the next level in accordance with DHS-USCIS procedures for final resolution.



F. Conflicts. This MOA constitutes the full MOA on this subject between DHS-USCIS and the User Agency. Any inconsistency or conflict between or among the provisions of this MOA, will be resolved in the following order of precedence: (1) this MOA and (2) other documents incorporated by reference in this MOA (e.g., transaction charges).

G. Severability. Nothing in this MOA is intended to conflict with current law or regulation or the directives of DHS, DHS-USCIS, or the User Agency. If a term of this MOA is inconsistent with such authority, then that term shall be invalid but, to the extent allowable, the remaining terms and conditions of this MOA shall remain in full force and effect. In the event of a conflict that prevents either party from fulfilling its obligations, this MOA may be immediately canceled without providing the 30-day notice period referenced in Section IX.

H. Assignment. The User Agency may not assign this MOA, nor may it assign any of its rights or obligations under this MOA. To the extent allowable by law, this MOA shall inure to the benefit of, and be binding upon, any successors to DHS-USCIS and the User Agency without restriction.

I. Waiver. No waiver by either party of any breach of any provision of this MOA shall constitute a waiver of any other breach. Failure of either party to enforce at any time, or from time to time, any provision of this MOA shall not be construed to be a waiver thereof.

J. Compliance with Other Laws. Nothing in this MOA is intended or should be construed to limit or affect the duties, responsibilities, and rights of the User Agency under the National Voter Registration Act, 52 U.S.C. § 20501 et seq., as amended; the Help America Vote Act, 52 U.S.C. § 20901 et seq., as amended; the Voting Rights Act, 52 U.S.C. § 10301 et seq., as amended; the Civil Rights Act, 52 U.S.C. § 10101 et seq., as amended; and all applicable state law.

VII. EFFECTIVE DATE.

This MOA shall be effective when the DHS-USCIS authorized official and User Agency authorized official have both signed the MOA. This MOA shall continue in effect until and unless modified or terminated in accordance with the provisions of this MOA.

VIII. MODIFICATION.

A. This MOA is subject to periodic review by DHS-USCIS, its authorized agents or designees, and, if necessary, periodic modification and/or renewal to assure compliance with current law, policy, and standard operating procedure(s). This MOA constitutes the complete MOA between the parties for its stated purpose, and no modification or addition will be valid unless entered into by mutual consent of both parties evidenced in writing and signed by both parties and appended to this agreement.

B. DHS-USCIS may accomplish unilateral administrative modifications to revise transaction charges and methods of payment, effective upon prior written notification to the User Agency. Either party may accomplish a unilateral administrative modification to change POC



information. A written bilateral modification (i.e., agreed to and signed by authorized officials of both parties) is required to change any other term of this MOA.

IX. TERMINATION.

Either party may terminate this MOA at any time by providing 30 days written notice of intent. DHS-USCIS and User Agency, when feasible, will consult with the other party and attempt to reconcile issues before terminating this MOA. Notwithstanding any other provision in the MOA, DHS-USCIS may suspend or terminate this MOA, and thereby the Agency's use of SAVE for voter registration and voter list maintenance purposes, without prior notice if deemed necessary because of a requirement of law or policy, upon a determination by DHS-USCIS that there has been a breach of system integrity or security by the User Agency or a failure by the User Agency to comply with established procedures or legal requirements, including but not limited to failure to pay.

Written notices shall be sent to the addresses of the POCs listed herein and shall be effective upon receipt. Either party may change its POC by written notice to the other party.

The foregoing, in conjunction with the incorporated references, constitutes the full agreement on this subject between DHS-USCIS and the User Agency. This MOA supersedes all previous agreements governing the provision of verification services related to voter registration and voter list maintenance. Those agreements are explicitly acknowledged to be null and void.

The undersigned represent that they are authorized to enter into this MOA on behalf of DHS-USCIS and the User Agency, respectively.

Digitally signed by
BRIAN J BRODERICK
Date: 2025.06.26
13:15:54 -04'00'

Brian J. Broderick
(Acting) Chief, Verification Division
U.S. Citizenship and Immigration Services
Department of Homeland Security

Date

Digitally signed by Kaiti
Lenhart
Date: 2025.06.26
08:18:21 -04'00'

Kaiti Lenhart
Supervisor of Elections
PO Box 901
Bunnell, FL 32110

06/26/2025

Date



U.S. Citizenship
and Immigration
Services

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Voter Registration and Voter List Maintenance Fact Sheet

Background

SAVE is an online service administered by U.S. Citizenship and Immigration Services (USCIS) within the Department of Homeland Security (DHS), that allows registered federal, state, and local government agencies to verify immigration status and U.S. citizenship of individuals seeking benefits, licenses, and for other authorized purposes.

Federal law allows only U.S. citizens to vote in federal elections, and SAVE is an effective tool that registered agencies, such as State divisions of elections, can use to verify U.S. citizenship for voter registration, voter list maintenance, or oversight of these processes (collectively, “voter verification”). When provided with required data elements, SAVE can usually verify U.S.-born citizens, naturalized U.S. citizens [\[1\]](#), and in certain cases, acquired U.S. citizens [\[2\]](#). SAVE can also verify immigration status if the individual is not a U.S. citizen, and whether the individual is deceased, if that information is retrievable.

SAVE provides verification information but does not determine an individual’s eligibility to register to vote, stay on a voting roll, or vote in an election. SAVE has offered voter verification services since 2005; election agencies from over 27 states are currently registered. Registered user agencies can be found using the [SAVE Agency Search Tool](#).

To register to use SAVE, user agency officials must sign a SAVE Memorandum of Agreement (MOA) which includes the legal authorities, processes, and requirements related to voter verification. A sample voter verification MOA is posted on SAVE’s [agency registration webpage](#).

What You Should Know

- **SAVE is not a source database of U.S. citizens and immigrants.** SAVE is an information service whereby user agencies submit information (such as name, date of birth, and an enumerator) and SAVE uses that information to query against source government systems, including those maintained by DHS, Department of State (DoS), and the Social Security Administration (SSA) to verify information. If retrievable, a point-in-time response that includes the individual’s U.S. citizenship status.



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- **SAVE is not the only way to determine U.S. citizenship.** SAVE only verifies and provides information about an individual's U.S. citizenship or immigration status based on available information held in various U.S. government systems and is one of many methods that voter verification agencies may use to verify U.S. citizenship.
- **SAVE optimized its service in 2025 to better serve voter verification agencies.** This optimization allowed agencies accessing SAVE through a web browser to create cases using a Social Security number (SSN) and to submit cases in bulk. SAVE also eliminated transaction charges for state and local agencies.
- **When a user agency creates a case using an SSN, SAVE first queries SSA databases.** Based on SSA data, SAVE can verify the U.S. citizenship of most U.S.-born individuals as well as check the SSA Death Master File. If SSA data confirm that the individual has an Alien number (A-number or USCIS number), that number is then used to query data available to DHS to confirm the U.S. citizenship or immigration status of the individual. When an SSN matches SSA records, and SSA and DHS records do not indicate U.S. citizenship, the SSN may also be used to check DoS records for evidence of U.S. citizenship. This would verify U.S. citizenship, for example, for an individual who acquired citizenship through a parent and was issued a U.S. passport but never updated his or her SSA records or applied for a Certificate of Citizenship with USCIS. If no match is found with SSA data, the voter verification agency is prompted to confirm their data and create a new case with corrected or additional information.
- **When an enumerator held in DHS data is available, whether entered by the agency or retrieved from an associated record within SSA or DHS, SAVE may use this data to provide a status response.** If a DHS enumerator (such as an A-Number or Naturalization/Citizenship Certificate Number) is provided or associated with an SSN within DHS systems, SAVE will retrieve applicable records to provide a SAVE response. If a U.S. passport number, U.S. passport card number, or other relevant identifier is located, SAVE searches DoS records. SAVE may provide a U.S. citizen response, an immigration status response (for example, Lawful Permanent Resident), or request additional information.
- **SAVE can only verify data it can access.** SAVE can verify U.S. citizenship for U.S. born citizens and citizens who have naturalized or have acquired U.S. citizenship provided there is a government record available to SAVE through DHS, DoS, or SSA systems. Accordingly, SAVE may not be able to confirm U.S. citizenship for an individual who: (1) is not designated as a U.S. citizen in SSA records, (2) has not received a Certificate of Citizenship or Naturalization from USCIS, and (3) has never been issued evidence of U.S. citizenship by DoS.
- **SAVE cases cannot be created using only a name and date of birth.** SAVE requires certain government-issued enumerators to create a case, such as an Alien Number or Social Security number, and cannot currently search using state-issued enumerators, such as driver's license numbers.
- **User agencies must take additional steps when required by SAVE for any case response other than "United States Citizen."** SAVE prohibits agencies from rejecting a voter registration or removing an individual from a voter roll based on a SAVE response until the agency has completed all SAVE-required steps. SAVE cases that initially determine a status other than U.S. citizen are automatically escalated to additional (manual) verification, and agencies may request additional verification if they receive an

unexpected SAVE response. Agencies are required to provide all registrants or registered voters who are not verified as U.S. citizens with the opportunity to provide proof of U.S. citizenship and to contact the relevant agency to correct their citizenship records, if necessary.

Summary of How Voter Verification Agencies Use SAVE to Verify U.S. Citizenship

- All SAVE users must complete required training, review program guidance, view the latest version of the [SAVE Tutorial](#) and maintain a working knowledge of requirements contained in the SAVE MOA.
- The voter verification agency submits or enters registrant or registered voter information into SAVE (individually or in bulk) and creates an electronic initial verification request. The information required to submit a SAVE case includes the individual's: first name, last name, date of birth, and one or more government-issued enumerators (for example, an A-number/USCIS Number, Certificate of Naturalization Number, Certificate of Citizenship Number, or Social Security number).
- SAVE usually provides an automated response within seconds (which includes, for example, citizenship indicator, death indicator, or instructions to submit a new case with additional information). Cases submitted in large volumes using the SAVE Bulk Upload tool are each processed as individual SAVE cases and typically receive initial responses within a day but may take longer depending on the total file size.
- If SAVE matches to government records and determines a potential non-U.S. citizen status (e.g., Lawful Permanent Resident), the case is automatically escalated for additional review, which includes a manual review of system responses and files available in federal records, prior to the result being displayed to the agency. If, after manual review, SAVE returns a final non-U.S. citizen response, user agencies must, as applicable to the situation, permit the registrant or registered voter an opportunity to correct their records with the appropriate Federal agency (e.g., SSA, DoS, or DHS) and/or present proof of citizenship in accordance with federal and state law prior to relying on a SAVE result to deny registration or remove someone from a voting roll. User agencies must also permit the registrant or registered voter to utilize any existing appeals process and must provide any right to notice, a hearing, and other due process available under applicable law. Information on federal record correction is available at [SAVE Records: Fast Facts for Benefit Applicants \(PDF, 59.08 KB\)](#).
 - If a case was created using a Social Security number as the only enumerator and SSA cannot match to a record, SAVE will close the case and instruct the user agency to review the original submission for data entry errors and create a new case with new or additional information. A no-match result based on SSA data is not a final SAVE response and cannot be used to deny registration or remove someone from a voting roll.
 - In some cases, SAVE requests that an agency upload a document as part of the manual review process [\[3\]](#). All additional verification steps required by SAVE must be completed to be considered a final SAVE response.

[1] For purposes of this Fact Sheet, “naturalized citizenship” refers to U.S. citizenship granted following an application for naturalization and meeting the requirements established by Congress in the Immigration and Nationality Act.

[2] For purposes of this Fact Sheet, “acquired citizenship” is defined as citizenship conveyed to children through the naturalization of parents or, under certain circumstances, at birth to foreign-born children of U.S. citizens, provided certain conditions are met. SAVE is only able to verify information that relates to information found in the databases accessed by the system. Accordingly, if the User Agency provides an immigration enumerator for an individual with acquired citizenship who has not applied for a Certificate of Citizenship with USCIS, the agency may not have that individual’s citizenship information available in the DHS databases accessed, and SAVE may not be able to confirm that individual’s acquired citizenship.

[3] Voter verification agencies should complete all additional verification steps required by SAVE to receive a final SAVE case response, or may use other processes or tools that allow them to make a definitive citizenship determination.

Last Reviewed/Updated: 08/27/2025



U.S. Citizenship
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[3] Voter verification agencies should complete all additional verification steps required by SAVE to receive a final SAVE case response, or may use other processes or tools that allow them to make a definitive citizenship determination.

Last Reviewed/Updated: 08/27/2025

UNITED STATES GOVERNMENT
GENERAL TERMS & CONDITIONS (GT & C)
FS Form 7600A



Agreement Between Federal Program Agencies for Intragovernmental Reimbursable, Buy/Sell Activity. In accordance with TFM Volume 1, Part 2, Chapter 4700, Appendix 8.

https://www.fiscal.treasury.gov/fsservices/gov/acctg/g_invoice/g_invoice_home.htm

NEW OR MODIFIED GT & C			
General Terms and Conditions (GT&C) Number		GT&C Number:A2505-070-028-078576	
		Requesting Agency (Buyer)	
		Servicing Agency (Seller)	
		Agency Agreement Tracking Number: CISIRWA25065	
		Agency Agreement Tracking Number: RAFDHS250004	
		Modification Number:0	
		Status:Open	
AGENCY INFORMATION			
1.		Requesting Agency (Buyer)	Servicing Agency (Seller)
	Agency Name	Department of Homeland Security (DHS) United States Citizenship & Immigration Services (USCIS)	Social Security Administration
	Group Name	SAVE Program	DCRDP ODEPPIN RA
	Group Description	5900 Capital Gateway Drive, Camp Springs, MD 20588	Office of Data Exchange, Policy Publications, & International Negotiation Reimbursable Agreements
	Document Inheritance Indicator	Yes	Yes
	Agency Location Code (ALC)	70011512	28040001
	ALC Description	70011512 - 070 - Department of Homeland Security - CITIZENSHIP & IMMIGRATION SVCS	28040001 - 028 - SOCIAL SECURITY ADMINISTRATION - HQ - DIV. OF CENTRAL ACCTING OPERATIONS
	Subordinate Group		DCRDP OISP RA - Office of Income Security Programs Reimbursable Agreements
	Cost Center	07-20-0600-00-00-00-00	
	Business Unit	Headquarters	
	Department ID	VER	
GT & C INFORMATION			

2.	GT&C Title	Citizenship and Immigration Status Verification Services	
3.	Business Application	Standard Order Processing	
4.	Order Originating Partner Indicator	Requesting Agency	
5.	Agreement Period	Start Date: 05/15/2025	End Date: 09/30/2025
6.	Termination Days	30	
7.	Agreement Type	Multiple	
8.	Advance Payment Indicator	Are Advance Payments allowed for GT&C? No *If "Yes", the Servicing Agency Advance Payment Authority Title and Citation are required upon creation of an Order against this GT&C.	
9.	Assisted Acquisition Indicator	Will this GT&C accommodate Assisted Acquisitions? No *If "Yes", the Servicing Agency provides acquisition support in awarding and managing contracts on behalf of the Requesting Agency's requirements for products or services. Lines 17 & 18 below for additional detail.	
ESTIMATED AGREEMENT AMOUNT			
10.	Total Direct Cost Amount	\$196,397.17	
	Total Overhead Fees and Charges Amount	\$0.00	
	Total Estimated Amount	\$196,397.17	
	Enforce Total Remaining Amount	Should G-Invoicing enforce the total value of orders to remain below the Total Amount on the GT&C? Yes *If "Yes", G-Invoicing will not allow Order total to exceed the GT&C total.	
ADDITIONAL AGREEMENT INFORMATION			
11.	Explanation of Overhead Fees and Charges		
12.	Requesting Scope		
13.	Requesting Roles		
14.	Servicing Roles	Refer to Information Sharing Letter Agreement.	
15.	Restrictions		
16.	Assisted Acquisitions Small Business Credit Clause	The Servicing Agency will allocate the socio-economic credit to the Requesting Agency for any contract actions it has executed on behalf of the Requesting Agency.	
17.	Disputes	Disputes related to this IAA shall be resolved in accordance with instructions provided in the Treasury Financial Manual (TFM) Volume I, Part 2, Chapter 4700, Appendix 5; Intragovernmental Transaction (IGT) Guide, at http://tfm.fiscal.treasury.gov/content/tfm/v1/p2/c470.html .	
18.	Requesting Assisted Acquisitions		
19.	Servicing Assisted Acquisitions		
20.	Requesting Clauses		

21.	Servicing Clauses	The estimated cost set forth in this agreement is based upon SSA's rough order of magnitude cost estimate to perform systems development work for this effort and is based on an estimated 40 million transactions. Within G-Invoicing, SSA may use G-Invoicing Representative Approvers to ministerially approve agreements (GT&C and Orders). Please refer to the Approved PDF Agreement in the attachment section of this GT&C and any underlying Orders for SSA's official approval.	
22.	Intentionally left blank		
23.	Intentionally left blank		
CLOSE GT&C			
24.			
REJECT GT&C			
25.			
PREPARER INFORMATION			
26.	Preparer Name	Anastasia Collins	
	Preparer Phone	4109655413	
	Preparer Email	anastasia.collins@ssa.gov	
AGREEMENT APPROVALS			
By signing this agreement, you authorize the General Terms and Conditions as stated, and that the scope of the work can be fulfilled. By signing, you agree to periodically review the terms and conditions of the agreement and make any necessary modifications to the GT&C and any affected Order(s)			
		Requesting Initial Approval (required)	Servicing Initial Approval (required)
27.	Name	KAREN TYLER	Jamillah Jackson
	Signature	Electronic Approval On File	Electronic Approval On File
	Title	MPA (b)(6)	Representative Approver on behalf of Jessica Burns MacBride
	Email		jamillah.n.jackson@ssa.gov
	Phone		4109653747
	Fax		
	Date Signed	07/29/2025	07/30/2025
		Requesting Final Approval (required)	Servicing Final Approval (required)
28.	Name	NICOLE WALKER	Jamillah Jackson
	Signature	Electronic Approval On File	Electronic Approval On File
	Title	Acting Budget Officer (b)(6)	Representative Approver on behalf of Jessica Burns MacBride
	Email		jamillah.n.jackson@ssa.gov
	Phone		4109653747
	Fax		
	Date Signed	07/29/2025	07/30/2025

ATTACHMENTS			
Name	File Alias	Updated By	Date/Time
SSA Signed RAFDH S_25000 4_7600 A orc3a.pdf		Collins, Anastasia (S)	08/28/2025 07:55 AM
Legal Agreement USCIS SSA 5-15-25 fe.pdf		Collins, Anastasia (S)	06/24/2025 01:19 PM
SOW - SSA_D. AkpanO CC0708 2025 SSA cmts 7.31.25 final tracked. docx		RAY, KALISHA (R)	08/11/2025 01:30 PM
VER250 028.pdf		RAY, KALISHA (R)	08/04/2025 10:21 AM

UNITED STATES GOVERNMENT
ORDER FORM
FS FORM 7600B



Agreement Between Federal Program Agencies for Intragovernmental Reimbursable, Buy/Sell Activity.

In accordance with TFM Volume 1, Part 2, Chapter 4700, Appendix 8.

<https://www.fiscal.treasury.gov/g-invoice>

G-Invoicing Required Fields have an (*)

NEW OR MODIFIED ORDER			
1.	* Order Number	Order Number: O2508-070-028-115617	
		Order Modification Number: 0	
2.	Order Status	Open	
3.	* General Terms & Conditions (GT&C) Number	A2505-070-028-078576	
4.	* Order Create Date	08/08/2025	
PARTNER INFORMATION			
5.	* Assisted Acquisition Indicator	No	
6.	* Period of Performance	Start Date: 05/15/2025	End Date: 09/30/2025
		Requesting Agency (Buyer)	Servicing Agency (Seller)
7.	* Agency Location Code (ALC)	70011512	28040001
8.	* Agency Name	Department of Homeland Security - CITIZENSHIP & IMMIGRATION SVCS	SOCIAL SECURITY ADMINISTRATION - HQ - DIV. OF CENTRAL ACCTING OPERATIONS
9.	Group Name	SAVE Program	DCRDP ODEPPIN RA
10.	Cost Center	07-20-0600-00-00-00-00	
11.	Business Unit	Headquarters	
12.	Department ID	VER	
13.	Order Tracking Number	CISIRWA25065	RAFDHS250004
14.	Unique Entity ID	R76CSFHNTQK5	
15.	Funding Office Code (Buyer Only)		
16.	Funding Agency Code (Buyer Only)		

17.	Comments		The estimated cost set forth in this agreement is based upon SSA's rough order of magnitude cost estimate to perform systems development work for this effort and is based on an estimated 40 million transactions. Within G-Invoicing, SSA may use Representative Approvers to ministerially approve agreements. Please refer to the Approved PDF Agreement in the attachment section of this Order for SSA's official approval.
AUTHORITY INFORMATION			
18.	* Statutory Authority Fund Type Code	Economy Act	
19.	Statutory Authority Fund Type Title		
20.	Statutory Authority Fund Type Citation		
		Requesting Agency (Buyer)	Servicing Agency (Seller)
21.	Program Authority Title		Section 1106(b) of the Social Security Act
22.	Program Authority Citation		Social Security Act, 42 U.S.C. § 1306
ADVANCE INFORMATION			
(Required by Servicing Agency if there is an advance.)			
23.	Advance Revenue Recognition Methodology		
24.	Advance Revenue Recognition Description (required if "Other")		
25.	Advance Payment Authority Title		
26.	Advance Payment Authority Citation		
27.	Total Advance Amount		
DELIVERY INFORMATION			
(Requesting Agency completes this section.)			
28.	* FOB Point	Source/Origin	
29.	Constructive Receipt Days		
30.	Acceptance Point	Source/Origin	
31.	Place of Acceptance		
32.	Inspection Point		

33.	Place of Inspection		
ORDER BILLING			
(Servicing Agency completes this section.)			
34.	* Billing Frequency	Quarterly	
35.	Billing Frequency Explanation		
ORDER BILLING			
(Requesting Agency completes this section.)			
36.	Priority Order Indicator	No	
37.	Capital Planning and Investment control (CPIC)	No	
LINE ITEM			
L1	* Line Number	1	
L1	Order Line Status	Active	
L1	* Item Code	9999	
L1	* Item Description	verification of citizenship information.	
L1	* Line Costs Unit of Measure (UOM)	DO	
L1	* Unit of Measure Description	Dollars, U.S.	
L1	Total Line Costs	\$196,397.17	
L1	Order Line Advance Amount		
L1	Product/Service Identifier		
L1	* Capitalized Asset Indicator	False	
L1	Item UID Required Indicator	No	
L1	* Type of Service Requirements	Severable	
SCHEDULE SUMMARY			
L1	S1	* Schedule Number	1
L1	S1	Advance Pay Indicator	No
L1	S1	* Cancel Status (schedule)	Active
L1	S1	* Schedule Unit Cost/Price	\$1.00
L1	S1	* Order Schedule Quantity	196,397.17
L1	S1	Order Schedule Amount	\$196,397.17

SCHEDULE FUNDING INFORMATION																			
			Requesting Agency (Buyer)								Servicing Agency (Seller)								
L1	S1	* Agency TAS	SP	ATA	AID	BPOA	EPOA	A	MAIN	SUB	SP	ATA	AID	BPOA	EPOA	A	MAIN	SUB	
					070			X	5088	000			028	2025	2025		8704	000	
L1	S1	* Agency Business Event Type Code	DISNGF								COLL								
L1	S1	Object Class Code	25.3								11.1								
L1	S1	Additional Accounting Classification	CISIRWA25065																
L1	S1	* Description of Products and/or Services including Bona Fide Need for this order (Buyer Only)	verification of citizenship information.																
SLOA INFORMATION																			
*To capture Agency Internal Accounting																			
			Requesting Agency (Buyer)								Servicing Agency (Seller)								
L1	S1	Accounting Classification Reference Number																	
L1	S1	Reimbursable Flag									Reimbursable								
L1	S1	Federal Award Identifier Number (FAIN)																	
L1	S1	Unique Record Identifier (URI)																	
L1	S1	Activity Address																	
L1	S1	Budget Line Item																	
L1	S1	Budget Fiscal Year									2025								
L1	S1	Security Cooperation (FMS)																	
L1	S1	Security Cooperation Implementing Agency Code																	
L1	S1	Security Cooperation Case Line Item Identifier																	
L1	S1	Sub-Allocation																	
L1	S1	Agency Accounting Identifier																	
L1	S1	Funding Center Identifier									4008048								
L1	S1	Cost Center Identifier																	
L1	S1	Project Identifier																	
L1	S1	Activity Identifier									6163								

L1	S1	Disbursing Identifier		
L1	S1	Cost Element Code		
L1	S1	Work Order Number		
L1	S1	Functional Area		
L1	S1	Agency Security Cooperation Case Designator		
L1	S1	Parent Award Identifier (PAID)		
L1	S1	Procurement Instrument Identifier (PIID)		
SCHEDULE SHIPPING INFORMATION				
(Requesting Agency completes this section.)				
L1	S1	Ship To Address Identifier		
L1	S1	Ship To Agency Title		
L1	S1	Address 1		
L1	S1	Address 2		
L1	S1	Address 3		
L1	S1	Ship To City		
L1	S1	Ship To Postal Code		
L1	S1	Ship To State		
L1	S1	Ship To Country		
L1	S1	Ship To Location Description		
L1	S1	Delivery/Shipping Information for Product Special Shipping Information		
L1	S1	Delivery/Shipping POC Name		
L1	S1	Delivery/Shipping Information for Product POC Title		
L1	S1	Delivery/Shipping Information for Product POC E-mail Address		
L1	S1	Delivery/Shipping Information for Product POC Telephone Number		
			Requesting Agency (Buyer)	Servicing Agency (Seller)

L1	S1	Agency Additional Information		The estimated cost set forth in this agreement is based upon SSA's rough order of magnitude cost estimate to perform systems development work for this effort and is based on an estimated 40 million transactions.
CLOSE ORDER				
38.	Closing Date			
	Closing Comments			
REJECT ORDER				
39.	Reject Date		08/29/2025	
	Reject Comments		Updates to line description, type of service requirements, and bona fide need fields.	
AGENCY POINTS OF CONTACTS (POC)				
		Requesting Agency (Buyer)		Servicing Agency (Seller)
40.	* Agency POC Name	Kalisha Ray (b)(6)		Anastasia Collins
	* Agency POC E-mail			Anastasia.Collins@ssa.gov
	* Agency POC Phone No			410-965-5413
	Agency POC Fax No			
AGREEMENT APPROVALS				
Funding Official				
The Funds Approving Officials, as identified by the Requesting Agency and Servicing Agency, certify that the funds are accurately cited and can be properly accounted for per the purposes set forth in the Order. The Requesting Agency Funding Official signs to obligate funds. The Servicing Agency Funding Official signs to start the work, and to bill, collect, and properly account for funds from the Requesting Agency, in accordance with the agreement.				
		Requesting Agency (Buyer)		Servicing Agency (Seller)
41.	* Funding Official Name	Chauncey Burrell		Jamillah Jackson
	* Signature	Electronic Approval On File		Electronic Approval On File
	Funding Official Title	Management and Program Analyst (b)(6)		Representative Approver on behalf of Susan Wilschke
	* Funding Official E-mail			jamillah.n.jackson@ssa.gov
	* Funding Official Phone No			4109653747
	Funding Official Fax No			
	Funding Official Date Signed	08/06/2025		09/04/2025
Program Official				
The Program Officials, as identified by the Requesting Agency and Servicing Agency, must ensure that the scope of work is properly defined and can be fulfilled for this order. The Program Official may or may not be the Contracting Officer depending on each agency's IAA business process.				
		Requesting Agency (Buyer)		Servicing Agency (Seller)
42.	* Program Official Name	Chirag Bhavsar		Jamillah Jackson

	* Signature	Electronic Approval On File	Electronic Approval On File
	Program Official Title	Associate Chief of Operations (b)(6)	Representative Approver on behalf of Susan Wilschke
	* Program Official E-mail		jamillah.n.jackson@ssa.gov
	* Program Official Phone No		4109653747
	Program Official Fax No		
	Program Official Date Signed	08/07/2025	09/04/2025
AGENCY PREPARER INFORMATION			
		Requesting Agency (Buyer)	Servicing Agency (Seller)
43.	* Name	KALISHA RAY	Anastasia Collins
	* Phone No		4109655413
	* E-mail Address		anastasia.collins@ssa.gov
ATTACHMENTS			
Name	File Alias	Uploaded By	Date/Time
SSA Signed RAFDH S_25000 4_7600 B orc3a.pdf		(b)(6)	08/28/2025 08:20 AM



U.S. Citizenship
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Statement of Work

1. **Title of Project**

Citizenship and Immigration Status Verification Services

2. **Period of Performance**

05/15/25-09/30/25

3. **Authority**

Reimbursement for activities related to this Statement of Work (SOW) shall be in accordance with the Economy Act, 31 U.S.C. 1535.

DHS-USCIS is authorized to participate in this information sharing under the authority of the Immigration and Nationality Act, Section 103, 8 U.S.C. § 1103, and the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, Section 642, codified at 8 U.S.C. § 1373(c).

SSA will provide DHS-USCIS information in accordance with 8 U.S.C. § 1373(a) and 42 U.S.C. § 1306.

This information sharing is also subject to requirements of:

- The Privacy Act of 1974, 5 U.S.C. § 552a;
 - The Federal Information Security Management Act of 2014 (FISMA; Pub. L. 113-283);
 - 20 C.F.R. § 401.120; and
- other laws, rules, regulations and applicable agency policies

4. **Parties**

The parties to this Statement of Work are the U.S. Citizenship and Immigration Services (USCIS) also known as the "Requesting Agency," and the Social Security Administration (SSA), also known as the "Servicing Agency."

The Agency Point of Contacts:

5. **USCIS Technical Representative**

Chirag Bhavsar, [REDACTED] (b)(6)

6. **USCIS Program Manager**

Brian Broderick, [REDACTED]

7. **SSA Point of Contact:**

Anastasia Collins, Anastasia.collins@ssa.gov, 410-965-5413

8. **Project Background**

SAVE's citizenship information verification initiative seeks to provide timely



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verification of citizenship or immigration status information in response to voter verification and other authorized inquiries from Federal, State, territorial, tribal and local government agencies seeking to verify or ascertain the citizenship or immigration status of individuals within their jurisdiction by using a social security number, or part thereof, as a search term or method to locate additional information in DHS-USCIS accessed records regarding the individual.

DHS-USCIS seeks access to SSA information accessed through the DHS-USCIS Verification Information System (VIS) for the purpose of verifying the citizenship and immigration status for benefits and licenses, as authorized by section 103 of the Immigration and Nationality Act, Pub. L. No. 82-414, as amended, 8 U.S.C. § 1103, Section 121(c)(1), Part C, of the Immigration Reform and Control Act of 1986, Pub. L. No. 99-603, 42 U.S.C. § 1320b-7 and note, and section 642 of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, Pub. L. No. 104-208, as amended, 8 U.S.C. § 1373(c).

SSA is providing assistance by sending to, and receiving from, DHS-USCIS information regarding the citizenship or immigration status, lawful or unlawful, of individuals within its records.

9. **Scope**

This Statement of Work, the Information Sharing Letter Agreement (dated May 15, 2025), and the applicable financial forms (i.e., FS Forms 7600A and 7600B) constitute the entire Agreement of the Parties with respect to the purposes set forth in this Agreement. SSA and DHS-USCIS have made no representations, warranties, or promises outside of this Agreement for use of data as described in this Agreement. This Agreement takes precedence over any other documents that may be in conflict with it, including any conflicting terms in any Interconnection Security Agreement (“ISA”) entered into in accordance with NIST SP 800-47 governing the interconnection between information technology systems that will be utilized for the transfer of information under this Agreement.

10. **SSA’s Responsibilities**

Under DHS-USCIS’ SAVE process SSA will provide electronic response codes to USCIS’ SAVE queries. These codes report which data elements sent to SSA by SAVE (name, SSN, and date of birth) match data elements in the Master Files of Social Security Number (SSN) Holders and SSN Applications (“Enumeration System”), 60-0058, system of records. The codes also report if there is a death or fraud indicator in the Enumeration System and the person’s citizenship status, as recorded in the Enumeration System.

SSA will provide responses to the SAVE queries within one second or less.

SSA will inform USCIS when its systems have a scheduled outage or planned maintenance that may negatively affect service.



SSA will safeguard any personally identifiable information (PII) obtained from SAVE agencies through the SAVE process in accordance with FISMA. SSA will limit access to this information to SSA employees involved in resolving SAVE cases, USCIS employees who administer SAVE, and individuals or entities authorized by the U.S. Government to evaluate SAVE.

USCIS' Responsibilities:

USCIS will only submit verification requests to SSA for authorized purposes.

USCIS will notify SSA of any pending or final changes in the statutory or regulatory requirements concerning SAVE.

USCIS will inform SSA if the SAVE system or other related connectivity system has a scheduled outage or planned maintenance that may negatively affect service.

After discovering a connectivity issue that may negatively affect SAVE service, USCIS will inform SSA.

USCIS will safeguard any PII obtained from SSA in accordance with the Privacy Act (5 U.S.C. § 552a) and FISMA. USCIS will limit access to this information to USCIS employees involved in resolving SAVE cases, USCIS employees who administer SAVE, and individuals or entities authorized by the U.S. Government to evaluate SAVE.

11. Security Components

SSA and USCIS will comply with FISMA, 44 U.S.C. § 3551 et seq., as amended by the Federal Information Security Modernization Act of 2014 (Pub. L. 113-283); FIPS, Mandatory Security Processing Standards 199 & 200; related OMB circulars and memoranda, including revised Circular A- 130, Management of Federal Information Resources (July 28, 2016); National Institute of Standards and Technology (NIST) directives; and the Federal Acquisition Regulations (FAR). These laws, regulations, and directives provide requirements for safeguarding Federal information systems and PII used in Federal agency business processes, as well as related reporting requirements.

FISMA requirements apply to all Federal contractors, organizations, or sources that possess or use Federal information, or that operate, use, or have access to Federal information systems on behalf of an agency. Each agency receiving information under this DSA is responsible for oversight and compliance of its contractors and agents with FISMA requirements.

12. Deliverables

SSA will disclose to USCIS data from the Enumeration System, 60-0058, last published in full at 90 Fed. Reg. 10025 (February 20, 2025).

USCIS will maintain information provided by SSA in its system of records entitled,



“DHS/U.S. Citizenship and Immigration Services (USCIS)-004 Systematic Alien Verification for Entitlements (SAVE) Program System of Records.”

Specified Data Elements

1. USCIS will provide SSA with the individual’s name, including other names used as applicable, date of birth, and either the full or partial SSN.
2. SSA will provide USCIS a “verified” or “not verified” response and in the case of a “not verified” response, the reason for the “not verified” will be provided. In rare circumstances, SSA is unable to disclose the reason why an SSN did not verify. In these cases, SSA will provide a reason of “other”.
3. SSA’s responses will contain the following:
 - SSN Match (True/False)
 - Full SSN for all matches (when a partial SSN is provided)
 - Name Match (True/False)
 - Date of Birth Match (True/False)
 - Citizenship/Foreign Indicator
 - Blank – Citizenship code is blank and foreign-born indicator is blank
 - Citizenship code is blank and foreign-born indicator is *
 - "A" - U.S. Citizen
 - "B" - Legal alien, eligible to work
 - "C" - Legal alien, not eligible to work
 - "D" - Other
 - "E" - Alien Student - restricted work authorized
 - "F" - Conditionally legalized alien
 - Alien Registration Number (where applicable)
 - Death Indicator (Yes Deceased / Not Deceased)
 - Error code descriptions (transaction and record levels)

An applicant for an original SSN provides identifying information, including citizenship, upon application for that number. However, there is no obligation for the SSN holder to report a subsequent change in immigration status to SSA unless that SSN holder files a claim for benefits. Thus, some previously established citizenship information in SSA’s records might not be current. There is no obligation for an individual to report to SSA a change in their citizenship or immigration status until they request a replacement card or file a claim for a Social Security benefit. While the citizenship information is accurate for SSA’s program purposes, if used later for other purposes, it may not be current. SSA is not the custodian of U.S. citizenship records

For individuals whom USCIS provides only a partial SSN, SSA will search our Numident database using USCIS’ supplied names and DOBs, and will only return a response record and full SSN in situations where the alpha search identifies a single individual.



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13. Place of Performance

The performance or delivery by USCIS of the goods and/or services described herein and the timeliness of said delivery are authorized only to the extent that they are consistent with proper performance of the official duties and obligations of USCIS. If for any reason USCIS delays or fails to provide services, or discontinues the services or any part thereof, USCIS is not liable for any damages or loss resulting from such delay or for any such failure or discontinuance.

The performance or delivery by SSA of the goods and/or services described herein and the timeliness of said delivery are authorized only to the extent that they are consistent with the duties described in the Information Sharing Letter Agreement. If for any reason SSA delays or fails to provide services, or discontinues the services or any part thereof, SSA is not liable for any damages or loss resulting from such delay or for any such failure or discontinuance.

Under DHS-USCIS' SAVE process SSA will provide electronic response codes to USCIS' SAVE queries. These codes report which data elements sent to SSA by SAVE (name, SSN, and date of birth) match data elements in the Enumeration System. The codes also report if there is a death or fraud indicator in the Enumeration System and the person's citizenship status, as recorded in the Enumeration System.

This SOW shall be effective upon the signature of the last signatory hereto and shall continue until the end of the Period of Performance described in Section 2.

14. Billings and Accompanying Documentation

SSA will bill USCIS for services rendered on a quarterly basis using the Treasury G-Invoicing System and collect said charges via Intra-governmental Payment and Collection (IPAC).

Accompanying documentation includes the LETTER AGREEMENT PROVIDING FOR INFORMATION SHARING BETWEEN THE DEPARTMENT OF HOMELAND SECURITY (DHS), U.S. CITIZENSHIP AND IMMIGRATION SERVICES (USCIS) AND THE SOCIAL SECURITY ADMINISTRATION (SSA) REGARDING CITIZENSHIP, and the FS Forms 7600A and 7600B.

15. Modification

Modifications to this Agreement must be in writing and agreed to by the parties.

This Agreement may be terminated by either party upon 30 days advance written notice.

If legislation is enacted that affects SAVE functions or provides for new functionality, the parties agree to modify this Agreement as appropriate to cover any new provisions.

16. Dispute Resolution

Disagreements on the interpretation of the provisions of this SOW that cannot be resolved between USCIS and the SSA point of contact should be provided in writing to the authorized officials at both agencies for resolution. If settlement cannot be reached at



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this level, the disagreement will be elevated to the next level in accordance with DHS-USCIS procedures for final resolution.

17. **Termination**

This Agreement may be terminated by either party upon 30 days advance written notice **or terminated in accordance with the provisions of** this Agreement.

REQUISITION — MATERIALS-SUPPLIES-EQUIPMENT SEE INSTRUCTIONS ON REVERSE				1. NUMBER VER250028	
				2. DATE 21-MAY-2025	
				3. ACTIVITY SYMBOL See Attachment A	
4. TO: NAME AND ADDRESS -- PROCUREMENT SECTION (OR STOREROOM) USCIS BURLINGTON CONTRACTING OFFICE 70 KIMBALL AVE SOUTH BURLINGTON, VT 05403			5. FROM: NAME AND ADDRESS -- REQUISITIONER DHS-USCIS-VERIFICATION DIVISION (b)(6) 5900 CAPITAL GATEWAY DRIVE, MAIL STOP 2600 CAMP SPRINGS, MD 20529-0009 US		

STOCK NUMBER	DESCRIPTION OF ARTICLE (MAKE, MODEL, TYPE, SIZE, COLOR, MFGR., ETC)	QUANTITY	UNIT	COST		ACTION CODE
				UNIT PRICE	AMOUNT	
6	7	8	9	10	11	12
CLIN 0001	INITIAL DEVELOPMENT COSTS AND TRANSACTIONS	1	EA	196,397 17	196,397 17	
Justification: TO FUND THE SOCIAL SECURITY ADMINISTRATION (SSA) SAVE OPTIMIZATION INITIAL DEVELOPMENT COSTS AND QUERIES. PROPOSED POP: 5/23/58-5/22/26 Recommended Vendor: No Recommended Vendor						
13. SIGNATURE OF APPROVING OFFICIAL F L OWENS		Date 21-MAY-2025		14. TITLE OF APPROVING OFFICIAL SUPVY MGMT & PROG ANAL		
24. SIGNATURE OF FUNDING OFFICIAL R A COX		Date 21-MAY-2025		25. TITLE OF FUNDING OFFICIAL MGMT & PROG ANAL		
				15. TOTAL 196,397 17		
16. KEY TO ACTION CODE				PROCUREMENT SECTION (OR STOREROOM)		
S	SUBSTITUTE ITEM	2	CANCELLED--NOT STOCKED	17. DATE RECEIVED		19. PURCHASE ORDER
B	BACK ORDERED	3	CANCELLED--NOT ABLE TO IDENTIFY	18. APPROVED		DATE
D	PURCHASED FOR DIRECT SHIPMENT	0	OTHER -- AS INDICATED			NUMBER
1	CANCELLED--STOCK EXHAUSTED					
I CERTIFY THAT THE ABOVE ARTICLES -- COLUMNS 3, 9 AND 12 - HAVE BEEN RECEIVED.						
20. LOCATION		21. DATE		22. SIGNATURE		23. TITLE

United States Department Of Homeland Security
Us Citizenship & Immigration Svcs
FORM G-514 (REV. 8-1-5)

Page 1 of 3

SSA-AR-0047

INSTRUCTIONS**Use**

Use Form G-514 - continued on Form G-514.1 -- To requisition materials, supplies, and equipment through the Procurement section of the Regional (or Central) Office; or from a Service-operated Storeroom.

Copies - Distribution

Prepared by requisitioner in an original and two copies, sending original (white) and Copy 1 (pink) to: Procurement Section (or Storeroom), and retaining Copy 2 (green). Procurement Section (or Storeroom) shall, as a rule, pack Copy 1 with shipment, or return it to requisitioner with appropriate advice.

Entries**By requisitioner:**

1. Number consecutively, beginning with number one each fiscal year, and prefix with alphabetic location symbol and last two digits of fiscal year (e.g., MIA-58-1, MIA-58-2, MIA-58-3, etc., MIA-59-1, MIA-59-2, MIA-59-3, etc.). Number continuation sheets with numerical suffix (e.g., MIA-58-1.1, MIA-58-1.2, MIA-58-1.3, etc.).
2. Enter date of preparation.
3. Enter numerical symbol of activity which will benefit from use of articles.
4. Enter name and address of Procurement section (or Storeroom) (e.g., Procurement Section, Immigration and Naturalization Service, Richmond, VA).
5. Enter full name, title, and address so that shipping label may be prepared without reference to address directory. If consignee is other than requisitioner, enter shipping instructions under Entry 7.
6. Enter form numbers; stock number shown in "Stores Stock Catalog" and "Federal Supply Schedules."
7. Enter full description of article; attach sketches, plans, samples, etc. If consignee is other than requisitioner, enter shipping instructions.
8. Enter issue - unit quantity.
9. Enter unit of issue (e.g., each, doz., C, gross, ream, M; lb., cwt, ton; bag, ball, bbl., bot., box, can, pkg., roll, tube; pt., qt., gal., etc.).
13. Signature of approving official.
14. Enter title of approving official.
24. Signature of funding official.
25. Enter title of funding official.

By Procurement Section (or Storeroom):

10. Enter unit price.
11. Enter product of Entries 8 and 10.
12. Enter symbol of action taken. See Entry 16.
15. Enter total of amounts under Entry 11.
17. Enter date requisition received.
18. Signature of approving officer.
19. Enter, if issued, date and number of purchase order.

By consignee:

20. Enter address - city and state.
21. Enter date shipment received.
22. Signature of employee authorized to accept delivery.
23. Enter title of receiving employee.

Form G-514
REQUISITION - MATERIALS-SUPPLIES-EQUIPMENT
Activity Symbols
ATTACHMENT A

REQUISITION NUMBER: VER250028

Item No.	Contract No.	Task Ord No.	Project	Task	Fund	Program	Organization	Object	UDF	Amount
1			SSASV01	000	EX	11-04-00-000	07-20-0000-00-00-00-00	GE-25-11-00	0000000	\$196,397.17

APPROPRIATION SYMBOL CROSSWALK:

FUND	FY	TAS	TITLE	AMOUNT
EX	2025	70X5088	Immigration Examination Fees, Immigration Services, Department of Homeland Security	196,397.17

UNITED STATES GOVERNMENT
GENERAL TERMS & CONDITIONS (GT & C)
FS Form 7600A



Agreement Between Federal Program Agencies for Intragovernmental Reimbursable, Buy/Sell Activity. In accordance with TFM Volume 1, Part 2, Chapter 4700, Appendix 8.

https://www.fiscal.treasury.gov/fsservices/gov/acctg/g_invoice/g_invoice_home.htm

NEW OR MODIFIED GT & C			
General Terms and Conditions (GT&C) Number		GT&C Number:A2505-070-028-078576	
		Requesting Agency (Buyer)	
		Servicing Agency (Seller)	
		Agency Agreement Tracking Number: CISIRWA25065	
		Agency Agreement Tracking Number: RAFDHS250004	
		Modification Number:0	
		Status:Open	
AGENCY INFORMATION			
1.		Requesting Agency (Buyer)	Servicing Agency (Seller)
	Agency Name	Department of Homeland Security (DHS) United States Citizenship & Immigration Services (USCIS)	Social Security Administration
	Group Name	SAVE Program	DCRDP ODEPPIN RA
	Group Description	5900 Capital Gateway Drive, Camp Springs, MD 20588	Office of Data Exchange, Policy Publications, & International Negotiation Reimbursable Agreements
	Document Inheritance Indicator	Yes	Yes
	Agency Location Code (ALC)	70011512	28040001
	ALC Description	70011512 - 070 - Department of Homeland Security - CITIZENSHIP & IMMIGRATION SVCS	28040001 - 028 - SOCIAL SECURITY ADMINISTRATION - HQ - DIV. OF CENTRAL ACCTING OPERATIONS
	Subordinate Group		DCRDP OISP RA - Office of Income Security Programs Reimbursable Agreements
	Cost Center	07-20-0600-00-00-00-00	
	Business Unit	Headquarters	
	Department ID	VER	
GT&C INFORMATION			

2.	GT&C Title	Citizenship and Immigration Status Verification Services	
3.	Business Application	Standard Order Processing	
4.	Order Originating Partner Indicator	Requesting Agency	
5.	Agreement Period	Start Date: 05/15/2025	End Date: 09/30/2025
6.	Termination Days	30	
7.	Agreement Type	Multiple	
8.	Advance Payment Indicator	Are Advance Payments allowed for GT&C? No *If "Yes", the Servicing Agency Advance Payment Authority Title and Citation are required upon creation of an Order against this GT&C.	
9.	Assisted Acquisition Indicator	Will this GT&C accommodate Assisted Acquisitions? No *If "Yes", the Servicing Agency provides acquisition support in awarding and managing contracts on behalf of the Requesting Agency's requirements for products or services. Lines 17 & 18 below for additional detail.	
ESTIMATED AGREEMENT AMOUNT			
10.	Total Direct Cost Amount	\$196,397.17	
	Total Overhead Fees and Charges Amount	\$0.00	
	Total Estimated Amount	\$196,397.17	
	Enforce Total Remaining Amount	Should G-Invoicing enforce the total value of orders to remain below the Total Amount on the GT&C? Yes *If "Yes", G-Invoicing will not allow Order total to exceed the GT&C total.	
ADDITIONAL AGREEMENT INFORMATION			
11.	Explanation of Overhead Fees and Charges		
12.	Requesting Scope		
13.	Requesting Roles		
14.	Servicing Roles	Refer to Information Sharing Letter Agreement.	
15.	Restrictions		
16.	Assisted Acquisitions Small Business Credit Clause	The Servicing Agency will allocate the socio-economic credit to the Requesting Agency for any contract actions it has executed on behalf of the Requesting Agency.	
17.	Disputes	Disputes related to this IAA shall be resolved in accordance with instructions provided in the Treasury Financial Manual (TFM) Volume I, Part 2, Chapter 4700, Appendix 5; Intragovernmental Transaction (IGT) Guide, at http://tfm.fiscal.treasury.gov/content/tfm/v1/p2/c470.html .	
18.	Requesting Assisted Acquisitions		
19.	Servicing Assisted Acquisitions		
20.	Requesting Clauses		

21.	Servicing Clauses	The estimated cost set forth in this agreement is based upon SSA's rough order of magnitude cost estimate to perform systems development work for this effort and is based on an estimated 40 million transactions. Within G-Invoicing, SSA may use G-Invoicing Representative Approvers to ministerially approve agreements (GT&C and Orders). Please refer to the Approved PDF Agreement in the attachment section of this GT&C and any underlying Orders for SSA's official approval.	
22.	Intentionally left blank		
23.	Intentionally left blank		
CLOSE GT&C			
24.			
REJECT GT&C			
25.			
PREPARER INFORMATION			
26.	Preparer Name	Anastasia Collins	
	Preparer Phone	4109655413	
	Preparer Email	anastasia.collins@ssa.gov	
AGREEMENT APPROVALS			
By signing this agreement, you authorize the General Terms and Conditions as stated, and that the scope of the work can be fulfilled. By signing, you agree to periodically review the terms and conditions of the agreement and make any necessary modifications to the GT&C and any affected Order(s)			
		Requesting Initial Approval (required)	Servicing Initial Approval (required)
27.	Name	KAREN TYLER	Jamillah Jackson
	Signature	Electronic Approval On File	Electronic Approval On File
	Title	MPA (b)(6)	Representative Approver on behalf of Jessica Burns MacBride
	Email		jamillah.n.jackson@ssa.gov
	Phone		4109653747
	Fax		
	Date Signed	07/29/2025	07/30/2025
		Requesting Final Approval (required)	Servicing Final Approval (required)
28.	Name	NICOLE WALKER	Jamillah Jackson
	Signature	Electronic Approval On File	Electronic Approval On File
	Title	Acting Budget Officer (b)(6)	Representative Approver on behalf of Jessica Burns MacBride
	Email		jamillah.n.jackson@ssa.gov
	Phone		4109653747
	Fax		
	Date Signed	07/29/2025	07/30/2025

ATTACHMENTS			
Name	File Alias	Updated By	Date/Time
SSA Signed RAFDH S_250004_7600A_orc3a.pdf		Collins, Anastasia (S)	08/28/2025 07:55 AM
Legal Agreement USCIS SSA 5-15-25 fe.pdf		Collins, Anastasia (S)	06/24/2025 01:19 PM
SOW - SSA_D. AkpanO CC0708 2025 SSA cmts 7.31.25 final tracked. docx		RAY, KALISHA (R)	08/11/2025 01:30 PM
VER250 028.pdf		RAY, KALISHA (R)	08/04/2025 10:21 AM

UNITED STATES GOVERNMENT
ORDER FORM
FS FORM 7600B



Agreement Between Federal Program Agencies for Intragovernmental Reimbursable, Buy/Sell Activity.

In accordance with TFM Volume 1, Part 2, Chapter 4700, Appendix 8.

<https://www.fiscal.treasury.gov/g-invoice>

G-Invoicing Required Fields have an (*)

NEW OR MODIFIED ORDER			
1.	* Order Number	Order Number: O2508-070-028-115617	
		Order Modification Number: 0	
2.	Order Status	Open	
3.	* General Terms & Conditions (GT&C) Number	A2505-070-028-078576	
4.	* Order Create Date	08/08/2025	
PARTNER INFORMATION			
5.	* Assisted Acquisition Indicator	No	
6.	* Period of Performance	Start Date: 05/15/2025	End Date: 09/30/2025
		Requesting Agency (Buyer)	Servicing Agency (Seller)
7.	* Agency Location Code (ALC)	70011512	28040001
8.	* Agency Name	Department of Homeland Security - CITIZENSHIP & IMMIGRATION SVCS	SOCIAL SECURITY ADMINISTRATION - HQ - DIV. OF CENTRAL ACCTING OPERATIONS
9.	Group Name	SAVE Program	DCRDP ODEPPIN RA
10.	Cost Center	07-20-0600-00-00-00-00	
11.	Business Unit	Headquarters	
12.	Department ID	VER	
13.	Order Tracking Number	CISIRWA25065	RAFDHS250004
14.	Unique Entity ID	R76CSFHNTQK5	
15.	Funding Office Code (Buyer Only)		
16.	Funding Agency Code (Buyer Only)		

17.	Comments		The estimated cost set forth in this agreement is based upon SSA's rough order of magnitude cost estimate to perform systems development work for this effort and is based on an estimated 40 million transactions. Within G-Invoicing, SSA may use Representative Approvers to ministerially approve agreements. Please refer to the Approved PDF Agreement in the attachment section of this Order for SSA's official approval.
AUTHORITY INFORMATION			
18.	* Statutory Authority Fund Type Code	Economy Act	
19.	Statutory Authority Fund Type Title		
20.	Statutory Authority Fund Type Citation		
		Requesting Agency (Buyer)	Servicing Agency (Seller)
21.	Program Authority Title		Section 1106(b) of the Social Security Act
22.	Program Authority Citation		Social Security Act, 42 U.S.C. § 1306
ADVANCE INFORMATION			
(Required by Servicing Agency if there is an advance.)			
23.	Advance Revenue Recognition Methodology		
24.	Advance Revenue Recognition Description (required if "Other")		
25.	Advance Payment Authority Title		
26.	Advance Payment Authority Citation		
27.	Total Advance Amount		
DELIVERY INFORMATION			
(Requesting Agency completes this section.)			
28.	* FOB Point	Source/Origin	
29.	Constructive Receipt Days		
30.	Acceptance Point	Source/Origin	
31.	Place of Acceptance		
32.	Inspection Point		

33.	Place of Inspection		
ORDER BILLING			
(Servicing Agency completes this section.)			
34.	*Billing Frequency	Quarterly	
35.	Billing Frequency Explanation		
ORDER BILLING			
(Requesting Agency completes this section.)			
36.	Priority Order Indicator	No	
37.	Capital Planning and Investment control (CPIC)	No	
LINE ITEM			
L1	*Line Number	1	
L1	Order Line Status	Active	
L1	*Item Code	9999	
L1	*Item Description	verification of citizenship information.	
L1	*Line Costs Unit of Measure (UOM)	DO	
L1	*Unit of Measure Description	Dollars, U.S.	
L1	Total Line Costs	\$196,397.17	
L1	Order Line Advance Amount		
L1	Product/Service Identifier		
L1	*Capitalized Asset Indicator	False	
L1	Item UID Required Indicator	No	
L1	*Type of Service Requirements	Severable	
SCHEDULE SUMMARY			
L1	S1	*Schedule Number	1
L1	S1	Advance Pay Indicator	No
L1	S1	*Cancel Status (schedule)	Active
L1	S1	*Schedule Unit Cost/Price	\$1.00
L1	S1	*Order Schedule Quantity	196,397.17
L1	S1	Order Schedule Amount	\$196,397.17

SCHEDULE FUNDING INFORMATION																			
			Requesting Agency (Buyer)								Servicing Agency (Seller)								
L1	S1	* Agency TAS	SP	ATA	AID	BPOA	EPOA	A	MAIN	SUB	SP	ATA	AID	BPOA	EPOA	A	MAIN	SUB	
					070			X	5088	000			028	2025	2025		8704	000	
L1	S1	* Agency Business Event Type Code	DISNGF								COLL								
L1	S1	Object Class Code	25.3								11.1								
L1	S1	Additional Accounting Classification	CISIRWA25065																
L1	S1	* Description of Products and/or Services including Bona Fide Need for this order (Buyer Only)	verification of citizenship information.																
SLOA INFORMATION																			
*To capture Agency Internal Accounting																			
			Requesting Agency (Buyer)								Servicing Agency (Seller)								
L1	S1	Accounting Classification Reference Number																	
L1	S1	Reimbursable Flag									Reimbursable								
L1	S1	Federal Award Identifier Number (FAIN)																	
L1	S1	Unique Record Identifier (URI)																	
L1	S1	Activity Address																	
L1	S1	Budget Line Item																	
L1	S1	Budget Fiscal Year									2025								
L1	S1	Security Cooperation (FMS)																	
L1	S1	Security Cooperation Implementing Agency Code																	
L1	S1	Security Cooperation Case Line Item Identifier																	
L1	S1	Sub-Allocation																	
L1	S1	Agency Accounting Identifier																	
L1	S1	Funding Center Identifier									4008048								
L1	S1	Cost Center Identifier																	
L1	S1	Project Identifier																	
L1	S1	Activity Identifier									6163								

L1	S1	Disbursing Identifier		
L1	S1	Cost Element Code		
L1	S1	Work Order Number		
L1	S1	Functional Area		
L1	S1	Agency Security Cooperation Case Designator		
L1	S1	Parent Award Identifier (PAID)		
L1	S1	Procurement Instrument Identifier (PIID)		
SCHEDULE SHIPPING INFORMATION				
(Requesting Agency completes this section.)				
L1	S1	Ship To Address Identifier		
L1	S1	Ship To Agency Title		
L1	S1	Address 1		
L1	S1	Address 2		
L1	S1	Address 3		
L1	S1	Ship To City		
L1	S1	Ship To Postal Code		
L1	S1	Ship To State		
L1	S1	Ship To Country		
L1	S1	Ship To Location Description		
L1	S1	Delivery/Shipping Information for Product Special Shipping Information		
L1	S1	Delivery/Shipping POC Name		
L1	S1	Delivery/Shipping Information for Product POC Title		
L1	S1	Delivery/Shipping Information for Product POC E-mail Address		
L1	S1	Delivery/Shipping Information for Product POC Telephone Number		
			Requesting Agency (Buyer)	Servicing Agency (Seller)

L1	S1	Agency Additional Information		The estimated cost set forth in this agreement is based upon SSA's rough order of magnitude cost estimate to perform systems development work for this effort and is based on an estimated 40 million transactions.
CLOSE ORDER				
38.	Closing Date			
	Closing Comments			
REJECT ORDER				
39.	Reject Date		08/29/2025	
	Reject Comments		Updates to line description, type of service requirements, and bona fide need fields.	
AGENCY POINTS OF CONTACTS (POC)				
		Requesting Agency (Buyer)		Servicing Agency (Seller)
40.	* Agency POC Name	Kalisha Ray (b)(6)		Anastasia Collins
	* Agency POC E-mail			Anastasia.Collins@ssa.gov
	* Agency POC Phone No			410-965-5413
	Agency POC Fax No			
AGREEMENT APPROVALS				
Funding Official				
The Funds Approving Officials, as identified by the Requesting Agency and Servicing Agency, certify that the funds are accurately cited and can be properly accounted for per the purposes set forth in the Order. The Requesting Agency Funding Official signs to obligate funds. The Servicing Agency Funding Official signs to start the work, and to bill, collect, and properly account for funds from the Requesting Agency, in accordance with the agreement.				
		Requesting Agency (Buyer)		Servicing Agency (Seller)
41.	* Funding Official Name	Chauncey Burrell		Jamillah Jackson
	* Signature	Electronic Approval On File		Electronic Approval On File
	Funding Official Title	Management and Program Analyst (b)(6)		Representative Approver on behalf of Susan Wilschke
	* Funding Official E-mail			jamillah.n.jackson@ssa.gov
	* Funding Official Phone No			4109653747
	Funding Official Fax No			
	Funding Official Date Signed	08/06/2025		09/04/2025
Program Official				
The Program Officials, as identified by the Requesting Agency and Servicing Agency, must ensure that the scope of work is properly defined and can be fulfilled for this order. The Program Official may or may not be the Contracting Officer depending on each agency's IAA business process.				
		Requesting Agency (Buyer)		Servicing Agency (Seller)
42.	* Program Official Name	Chirag Bhavsar		Jamillah Jackson

Order Number: O2508-070-028-115617

Page 7

	* Signature	Electronic Approval On File	Electronic Approval On File
	Program Official Title	Associate Chief of Operations (b)(6)	Representative Approver on behalf of Susan Wilschke
	* Program Official E-mail		jamillah.n.jackson@ssa.gov
	* Program Official Phone No		4109653747
	Program Official Fax No		
	Program Official Date Signed	08/07/2025	09/04/2025
AGENCY PREPARER INFORMATION			
		Requesting Agency (Buyer)	Servicing Agency (Seller)
43.	* Name	KALISHA RAY	Anastasia Collins
	* Phone No		4109655413
	* E-mail Address		anastasia.collins@ssa.gov
ATTACHMENTS			
Name	File Alias	Uploaded By	Date/Time
SSA Signed RAFDH S_25000 4_7600 B orc3a.pdf		(b)(6)	08/28/2025 08:20 AM



U.S. Citizenship
and Immigration
Services

Statement of Work

1. **Title of Project**

Citizenship and Immigration Status Verification Services

2. **Period of Performance**

05/15/25-09/30/25

3. **Authority**

Reimbursement for activities related to this Statement of Work (SOW) shall be in accordance with the Economy Act, 31 U.S.C. 1535.

DHS-USCIS is authorized to participate in this information sharing under the authority of the Immigration and Nationality Act, Section 103, 8 U.S.C. § 1103, and the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, Section 642, codified at 8 U.S.C. § 1373(c).

SSA will provide DHS-USCIS information in accordance with 8 U.S.C. § 1373(a) and 42 U.S.C. § 1306.

This information sharing is also subject to requirements of:

- The Privacy Act of 1974, 5 U.S.C. § 552a;
 - The Federal Information Security Management Act of 2014 (FISMA; Pub. L. 113-283);
 - 20 C.F.R. § 401.120; and
- other laws, rules, regulations and applicable agency policies

4. **Parties**

The parties to this Statement of Work are the U.S. Citizenship and Immigration Services (USCIS) also known as the "Requesting Agency," and the Social Security Administration (SSA), also known as the "Servicing Agency."

The Agency Point of Contacts:

5. **USCIS Technical Representative**

Chirag Bhavsar, [REDACTED] (b)(6)

6. **USCIS Program Manager**

Brian Broderick, [REDACTED]

7. **SSA Point of Contact:**

Anastasia Collins, Anastasia.collins@ssa.gov, 410-965-5413

8. **Project Background**

SAVE's citizenship information verification initiative seeks to provide timely



U.S. Citizenship
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verification of citizenship or immigration status information in response to voter verification and other authorized inquiries from Federal, State, territorial, tribal and local government agencies seeking to verify or ascertain the citizenship or immigration status of individuals within their jurisdiction by using a social security number, or part thereof, as a search term or method to locate additional information in DHS-USCIS accessed records regarding the individual.

DHS-USCIS seeks access to SSA information accessed through the DHS-USCIS Verification Information System (VIS) for the purpose of verifying the citizenship and immigration status for benefits and licenses, as authorized by section 103 of the Immigration and Nationality Act, Pub. L. No. 82-414, as amended, 8 U.S.C. § 1103, Section 121(c)(1), Part C, of the Immigration Reform and Control Act of 1986, Pub. L. No. 99-603, 42 U.S.C. § 1320b-7 and note, and section 642 of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, Pub. L. No. 104-208, as amended, 8 U.S.C. § 1373(c).

SSA is providing assistance by sending to, and receiving from, DHS-USCIS information regarding the citizenship or immigration status, lawful or unlawful, of individuals within its records.

9. Scope

This Statement of Work, the Information Sharing Letter Agreement (dated May 15, 2025), and the applicable financial forms (i.e., FS Forms 7600A and 7600B) constitute the entire Agreement of the Parties with respect to the purposes set forth in this Agreement. SSA and DHS-USCIS have made no representations, warranties, or promises outside of this Agreement for use of data as described in this Agreement. This Agreement takes precedence over any other documents that may be in conflict with it, including any conflicting terms in any Interconnection Security Agreement (“ISA”) entered into in accordance with NIST SP 800-47 governing the interconnection between information technology systems that will be utilized for the transfer of information under this Agreement.

10. SSA’s Responsibilities

Under DHS-USCIS’ SAVE process SSA will provide electronic response codes to USCIS’ SAVE queries. These codes report which data elements sent to SSA by SAVE (name, SSN, and date of birth) match data elements in the Master Files of Social Security Number (SSN) Holders and SSN Applications (“Enumeration System”), 60-0058, system of records. The codes also report if there is a death or fraud indicator in the Enumeration System and the person’s citizenship status, as recorded in the Enumeration System.

SSA will provide responses to the SAVE queries within one second or less.

SSA will inform USCIS when its systems have a scheduled outage or planned maintenance that may negatively affect service.



SSA will safeguard any personally identifiable information (PII) obtained from SAVE agencies through the SAVE process in accordance with FISMA. SSA will limit access to this information to SSA employees involved in resolving SAVE cases, USCIS employees who administer SAVE, and individuals or entities authorized by the U.S. Government to evaluate SAVE.

USCIS' Responsibilities:

USCIS will only submit verification requests to SSA for authorized purposes.

USCIS will notify SSA of any pending or final changes in the statutory or regulatory requirements concerning SAVE.

USCIS will inform SSA if the SAVE system or other related connectivity system has a scheduled outage or planned maintenance that may negatively affect service.

After discovering a connectivity issue that may negatively affect SAVE service, USCIS will inform SSA.

USCIS will safeguard any PII obtained from SSA in accordance with the Privacy Act (5 U.S.C. § 552a) and FISMA. USCIS will limit access to this information to USCIS employees involved in resolving SAVE cases, USCIS employees who administer SAVE, and individuals or entities authorized by the U.S. Government to evaluate SAVE.

11. Security Components

SSA and USCIS will comply with FISMA, 44 U.S.C. § 3551 et seq., as amended by the Federal Information Security Modernization Act of 2014 (Pub. L. 113-283); FIPS, Mandatory Security Processing Standards 199 & 200; related OMB circulars and memoranda, including revised Circular A- 130, Management of Federal Information Resources (July 28, 2016); National Institute of Standards and Technology (NIST) directives; and the Federal Acquisition Regulations (FAR). These laws, regulations, and directives provide requirements for safeguarding Federal information systems and PII used in Federal agency business processes, as well as related reporting requirements.

FISMA requirements apply to all Federal contractors, organizations, or sources that possess or use Federal information, or that operate, use, or have access to Federal information systems on behalf of an agency. Each agency receiving information under this DSA is responsible for oversight and compliance of its contractors and agents with FISMA requirements.

12. Deliverables

SSA will disclose to USCIS data from the Enumeration System, 60-0058, last published in full at 90 Fed. Reg. 10025 (February 20, 2025).

USCIS will maintain information provided by SSA in its system of records entitled,



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“DHS/U.S. Citizenship and Immigration Services (USCIS)-004 Systematic Alien Verification for Entitlements (SAVE) Program System of Records.”

Specified Data Elements

1. USCIS will provide SSA with the individual’s name, including other names used as applicable, date of birth, and either the full or partial SSN.
2. SSA will provide USCIS a “verified” or “not verified” response and in the case of a “not verified” response, the reason for the “not verified” will be provided. In rare circumstances, SSA is unable to disclose the reason why an SSN did not verify. In these cases, SSA will provide a reason of “other”.
3. SSA’s responses will contain the following:
 - SSN Match (True/False)
 - Full SSN for all matches (when a partial SSN is provided)
 - Name Match (True/False)
 - Date of Birth Match (True/False)
 - Citizenship/Foreign Indicator
 - Blank – Citizenship code is blank and foreign-born indicator is blank
 - Citizenship code is blank and foreign-born indicator is *
 - "A" - U.S. Citizen
 - "B" - Legal alien, eligible to work
 - "C" - Legal alien, not eligible to work
 - "D" - Other
 - "E" - Alien Student - restricted work authorized
 - "F" - Conditionally legalized alien
 - Alien Registration Number (where applicable)
 - Death Indicator (Yes Deceased / Not Deceased)
 - Error code descriptions (transaction and record levels)

An applicant for an original SSN provides identifying information, including citizenship, upon application for that number. However, there is no obligation for the SSN holder to report a subsequent change in immigration status to SSA unless that SSN holder files a claim for benefits. Thus, some previously established citizenship information in SSA’s records might not be current. There is no obligation for an individual to report to SSA a change in their citizenship or immigration status until they request a replacement card or file a claim for a Social Security benefit. While the citizenship information is accurate for SSA’s program purposes, if used later for other purposes, it may not be current. SSA is not the custodian of U.S. citizenship records

For individuals whom USCIS provides only a partial SSN, SSA will search our Numident database using USCIS’ supplied names and DOBs, and will only return a response record and full SSN in situations where the alpha search identifies a single individual.



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13. Place of Performance

The performance or delivery by USCIS of the goods and/or services described herein and the timeliness of said delivery are authorized only to the extent that they are consistent with proper performance of the official duties and obligations of USCIS. If for any reason USCIS delays or fails to provide services, or discontinues the services or any part thereof, USCIS is not liable for any damages or loss resulting from such delay or for any such failure or discontinuance.

The performance or delivery by SSA of the goods and/or services described herein and the timeliness of said delivery are authorized only to the extent that they are consistent with the duties described in the Information Sharing Letter Agreement. If for any reason SSA delays or fails to provide services, or discontinues the services or any part thereof, SSA is not liable for any damages or loss resulting from such delay or for any such failure or discontinuance.

Under DHS-USCIS' SAVE process SSA will provide electronic response codes to USCIS' SAVE queries. These codes report which data elements sent to SSA by SAVE (name, SSN, and date of birth) match data elements in the Enumeration System. The codes also report if there is a death or fraud indicator in the Enumeration System and the person's citizenship status, as recorded in the Enumeration System.

This SOW shall be effective upon the signature of the last signatory hereto and shall continue until the end of the Period of Performance described in Section 2.

14. Billings and Accompanying Documentation

SSA will bill USCIS for services rendered on a quarterly basis using the Treasury G-Invoicing System and collect said charges via Intra-governmental Payment and Collection (IPAC).

Accompanying documentation includes the LETTER AGREEMENT PROVIDING FOR INFORMATION SHARING BETWEEN THE DEPARTMENT OF HOMELAND SECURITY (DHS), U.S. CITIZENSHIP AND IMMIGRATION SERVICES (USCIS) AND THE SOCIAL SECURITY ADMINISTRATION (SSA) REGARDING CITIZENSHIP, and the FS Forms 7600A and 7600B.

15. Modification

Modifications to this Agreement must be in writing and agreed to by the parties.

This Agreement may be terminated by either party upon 30 days advance written notice.

If legislation is enacted that affects SAVE functions or provides for new functionality, the parties agree to modify this Agreement as appropriate to cover any new provisions.

16. Dispute Resolution

Disagreements on the interpretation of the provisions of this SOW that cannot be resolved between USCIS and the SSA point of contact should be provided in writing to the authorized officials at both agencies for resolution. If settlement cannot be reached at



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this level, the disagreement will be elevated to the next level in accordance with DHS-USCIS procedures for final resolution.

17. **Termination**

This Agreement may be terminated by either party upon 30 days advance written notice **or terminated in accordance with the provisions of** this Agreement.

REQUISITION — MATERIALS-SUPPLIES-EQUIPMENT SEE INSTRUCTIONS ON REVERSE				1. NUMBER VER250028	
				2. DATE 21-MAY-2025	
				3. ACTIVITY SYMBOL See Attachment A	
4. TO: NAME AND ADDRESS -- PROCUREMENT SECTION (OR STOREROOM) USCIS BURLINGTON CONTRACTING OFFICE 70 KIMBALL AVE SOUTH BURLINGTON, VT 05403			5. FROM: NAME AND ADDRESS -- REQUISITIONER DHS-USCIS-VERIFICATION DIVISION (b)(6) 5900 CAPITAL GATEWAY DRIVE, MAIL STOP 2600 CAMP SPRINGS, MD 20529-0009 US		

STOCK NUMBER	DESCRIPTION OF ARTICLE (MAKE, MODEL, TYPE, SIZE, COLOR, MFG., ETC)	QUANTITY	UNIT	COST		ACTION CODE
				UNIT PRICE	AMOUNT	
6	7	8	9	10	11	12
CLIN 0001	INITIAL DEVELOPMENT COSTS AND TRANSACTIONS	1	EA	196,397 17	196,397 17	
Justification: TO FUND THE SOCIAL SECURITY ADMINISTRATION (SSA) SAVE OPTIMIZATION INITIAL DEVELOPMENT COSTS AND QUERIES. PROPOSED POP: 5/23/58-5/22/26 Recommended Vendor: No Recommended Vendor						
13. SIGNATURE OF APPROVING OFFICIAL F L OWENS		Date 21-MAY-2025		14. TITLE OF APPROVING OFFICIAL SUPVY MGMT & PROG ANAL		
24. SIGNATURE OF FUNDING OFFICIAL R A COX		Date 21-MAY-2025		25. TITLE OF FUNDING OFFICIAL MGMT & PROG ANAL		
				15. TOTAL 196,397 17		

16. KEY TO ACTION CODE				PROCUREMENT SECTION (OR STOREROOM)	
S	SUBSTITUTE ITEM	2	CANCELLED--NOT STOCKED	17. DATE RECEIVED	19. PURCHASE ORDER
B	BACK ORDERED	3	CANCELLED--NOT ABLE TO IDENTIFY		DATE
D	PURCHASED FOR DIRECT SHIPMENT	0	OTHER -- AS INDICATED	18. APPROVED	NUMBER
1	CANCELLED--STOCK EXHAUSTED				

I CERTIFY THAT THE ABOVE ARTICLES -- COLUMNS 3, 9 AND 12 - HAVE BEEN RECEIVED.			
20. LOCATION	21. DATE	22. SIGNATURE	23. TITLE

INSTRUCTIONS**Use**

Use Form G-514 - continued on Form G-514.1 -- To requisition materials, supplies, and equipment through the Procurement section of the Regional (or Central) Office; or from a Service-operated Storeroom.

Copies - Distribution

Prepared by requisitioner in an original and two copies, sending original (white) and Copy 1 (pink) to: Procurement Section (or Storeroom), and retaining Copy 2 (green). Procurement Section (or Storeroom) shall, as a rule, pack Copy 1 with shipment, or return it to requisitioner with appropriate advice.

Entries**By requisitioner:**

1. Number consecutively, beginning with number one each fiscal year, and prefix with alphabetic location symbol and last two digits of fiscal year (e.g., MIA-58-1, MIA-58-2, MIA-58-3, etc., MIA-59-1, MIA-59-2, MIA-59-3, etc.). Number continuation sheets with numerical suffix (e.g., MIA-58-1.1, MIA-58-1.2, MIA-58-1.3, etc.).
2. Enter date of preparation.
3. Enter numerical symbol of activity which will benefit from use of articles.
4. Enter name and address of Procurement section (or Storeroom) (e.g., Procurement Section, Immigration and Naturalization Service, Richmond, VA).
5. Enter full name, title, and address so that shipping label may be prepared without reference to address directory. If consignee is other than requisitioner, enter shipping instructions under Entry 7.
6. Enter form numbers; stock number shown in "Stores Stock Catalog" and "Federal Supply Schedules."
7. Enter full description of article; attach sketches, plans, samples, etc. If consignee is other than requisitioner, enter shipping instructions.
8. Enter issue - unit quantity.
9. Enter unit of issue (e.g., each, doz., C, gross, ream, M; lb., cwt, ton; bag, ball, bbl., bot., box, can, pkg., roll, tube; pt., qt., gal., etc.).
13. Signature of approving official.
14. Enter title of approving official.
24. Signature of funding official.
25. Enter title of funding official.

By Procurement Section (or Storeroom):

10. Enter unit price.
11. Enter product of Entries 8 and 10.
12. Enter symbol of action taken. See Entry 16.
15. Enter total of amounts under Entry 11.
17. Enter date requisition received.
18. Signature of approving officer.
19. Enter, if issued, date and number of purchase order.

By consignee:

20. Enter address - city and state.
21. Enter date shipment received.
22. Signature of employee authorized to accept delivery.
23. Enter title of receiving employee.

Form G-514
REQUISITION - MATERIALS-SUPPLIES-EQUIPMENT
Activity Symbols
ATTACHMENT A

REQUISITION NUMBER: VER250028

Item No.	Contract No.	Task Ord No.	Project	Task	Fund	Program	Organization	Object	UDF	Amount
1			SSASV01	000	EX	11-04-00-000	07-20-0000-00-00-00-00	GE-25-11-00	0000000	\$196,397.17

APPROPRIATION SYMBOL CROSSWALK:

FUND	FY	TAS	TITLE	AMOUNT
EX	2025	70X5088	Immigration Examination Fees, Immigration Services, Department of Homeland Security	196,397.17

Federal Register Publication -
<https://www.federalregister.gov/documents/2025/11/12/2025-19849/privacy-act-of-1974-system-of-records>

**III. Summary Proceeding(s)**

1. *Docket No(s)*: MC2026–87 and K2026–87; *Filing Title*: USPS Request to Add New Fulfillment Standardized Distinct Product, PM–GA Contract 912, and Notice of Filing Materials Under Seal; *Filing Acceptance Date*: November 6, 2025; *Filing Authority*: 39 U.S.C. 3642 and 3633, 39 CFR 3035.105, and 39 CFR 3041.325.

This Notice will be published in the Federal Register.

Erica A. Barker,
Secretary.

[FR Doc. 2025–19857 Filed 11–10–25; 8:45 am]

BILLING CODE 7710–FW–P

POSTAL SERVICE

Product Change—Priority Mail Express, Priority Mail, and USPS Ground Advantage Negotiated Service Agreements; Priority Mail and USPS Ground Advantage Negotiated Service Agreements; Priority Mail Express, Priority Mail, USPS Ground Advantage, and Parcel Select Negotiated Service Agreements

AGENCY: Postal Service.

ACTION: Notice.

SUMMARY: The Postal Service gives notice of filing a request with the Postal Regulatory Commission to add a

domestic shipping services contract to the list of Negotiated Service Agreements in the Mail Classification Schedule's Competitive Products List.

DATES: *Date of required notice:* November 12, 2025.

FOR FURTHER INFORMATION CONTACT: Sean C. Robinson, 202–268–8405.

SUPPLEMENTARY INFORMATION: The United States Postal Service hereby gives notice that, pursuant to 39 U.S.C. 3642 and 3632(b)(3), it filed with the Postal Regulatory Commission the following requests:

Date filed with Postal Regulatory Commission	Negotiated service agreement product category and No.	MC docket No.	K docket No.
10/31/25	PME–PM–GA–PS 6	MC2026–73	K2026–73
11/03/25	PME–PM–GA 1454	MC2026–74	K2026–74
11/03/25	PME–PM–GA 1455	MC2026–75	K2026–75
11/03/25	PM–GA 904	MC2026–76	K2026–76
11/03/25	PME–PM–GA 1456	MC2026–78	K2026–78
11/04/25	PM–GA 905	MC2026–79	K2026–79
11/04/25	PM–GA 906	MC2026–80	K2026–80
11/04/25	PM–GA 907	MC2026–81	K2026–81
11/05/25	PM–GA 908	MC2026–82	K2026–82
11/05/25	PM–GA 909	MC2026–83	K2026–83
11/05/25	PM–GA 910	MC2026–84	K2026–84
11/05/25	PM–GA 911	MC2026–85	K2026–85
11/06/25	PME–PM–GA 1457	MC2026–86	K2026–86
11/06/25	PM–GA 912	MC2026–87	K2026–87

Documents are available at www.prc.gov.

Colleen Hibbert-Kapler,
Attorney, Ethics and Legal Compliance.
[FR Doc. 2025–19842 Filed 11–10–25; 8:45 am]

BILLING CODE 7710–12–P

SMALL BUSINESS ADMINISTRATION

[Disaster Declaration #21342; ILLINOIS Disaster Number IL–20021 Declaration of Economic Injury]

Administrative Declaration of an Economic Injury Disaster for the State of Illinois

AGENCY: U.S. Small Business Administration.

ACTION: Notice.

SUMMARY: This is a notice of an Economic Injury Disaster Loan (EIDL) declaration for the State of Illinois dated November 6, 2025.

Incident: Algal Bloom Water Contamination.

DATES: Issued on November 6, 2025.

Incident Period: July 10, 2025 through August 1, 2025.

Economic Injury (EIDL) Loan Application Deadline Date: August 6, 2026.

ADDRESSES: Visit the MySBA Loan Portal at <https://lending.sba.gov> to apply for a disaster assistance loan.

FOR FURTHER INFORMATION CONTACT: Sharon Henderson, Office of Disaster Recovery & Resilience, U.S. Small Business Administration, 409 3rd Street SW, Suite 6050, Washington, DC 20416, (202) 205–6734.

SUPPLEMENTARY INFORMATION: Notice is hereby given that as a result of the Administrator's EIDL declaration, applications for disaster loans may be submitted online using the MySBA Loan Portal <https://lending.sba.gov> or other locally announced locations. Please contact the SBA disaster assistance customer service center by email at disastercustomerservice@sba.gov or by phone at 1–800–659–2955 for further assistance.

The following areas have been determined to be adversely affected by the disaster:

Primary County: Coles.

Contiguous Counties:

Illinois: Clark, Cumberland, Douglas, Edgar, Moultrie, Shelby.

The Interest Rates are:

	Percent
Business and Small Agricultural Cooperatives without Credit Available Elsewhere	4.000
Non-Profit Organizations without Credit Available Elsewhere	3.625

The number assigned to this disaster for economic injury is 213420.

The State which received an EIDL Declaration is Illinois.

(Catalog of Federal Domestic Assistance Number 59008)

(Authority: 13 CFR 123.3(b).)

James Stallings,

Associate Administrator, Office of Disaster Recovery and Resilience.

[FR Doc. 2025–19841 Filed 11–10–25; 8:45 am]

BILLING CODE 8026–09–P

SOCIAL SECURITY ADMINISTRATION

[Docket No. SSA–2025–0225]

Privacy Act of 1974; System of Records

AGENCY: Social Security Administration (SSA).

ACTION: Notice of a modified system of records.

SUMMARY: In accordance with the Privacy Act of 1974, we are issuing public notice of our intent to modify an existing system of records entitled, Master Files of Social Security Number (SSN) Holders and SSN Applications (60–0058), last published on February 20, 2025. This notice publishes details of the modified system as set forth below under the caption,

SUPPLEMENTARY INFORMATION.

DATES: The system of records notice (SORN) is applicable upon its publication in today's **Federal Register**, with the exception of the new routine uses, which are effective December 12, 2025.

We invite public comment on the routine uses or other aspects of this SORN. In accordance with the Privacy Act of 1974, we are providing the public a 30-day period in which to submit comments. Therefore, please submit any comments no later than December 12, 2025.

ADDRESSES: The public, Office of Management and Budget (OMB), and Congress may comment on this publication by writing to the Head of Privacy and Disclosure Policy, Law and Policy, SSA, Room G–401 West High Rise, 6401 Security Boulevard, Baltimore, Maryland 21235–6401, or through the Federal e-Rulemaking Portal at <https://www.regulations.gov>. Please reference docket number SSA–2025–0225. All comments we receive will be available for public inspection at the above address and we will post them to <https://www.regulations.gov>.

FOR FURTHER INFORMATION CONTACT: Tristin Dorsey, Government Information Specialist, Privacy Implementation Division, Privacy and Disclosure Policy, Law and Policy, SSA, Room G–401 West High Rise, 6401 Security Boulevard, Baltimore, Maryland 21235–6401, telephone: (410) 966–5855, email: OGC.OPD.SORN@ssa.gov.

SUPPLEMENTARY INFORMATION: We are modifying the system location to clarify where the agency will maintain records. We are modifying the system manager to clarify the office responsible for maintaining the system. We are clarifying the language in existing routine uses No. 6, 7, 10, 12, 17, 25, and 45 for easier reading. We are deleting existing routine use No. 2, as it is duplicative. We are adding two new routine uses that will permit disclosures to the following:

- citizenship and immigration information to the Department of

Homeland Security, pursuant to 8 U.S.C. 1373(a), and

- the Department of the Treasury, to review SSA's payment and award eligibility through the Do Not Pay Working System for the purpose of identifying, preventing, or recouping fraud and improper payments when disclosure meets the requirements in 20 CFR 401.150(c).

In addition, we are modifying the notice throughout to correct miscellaneous stylistic formatting and typographical errors of the previously published notice, and to ensure the language reads consistently across multiple systems. We are republishing the entire notice for ease of reference.

In accordance with 5 U.S.C. 552a(r), we have provided a report to OMB and Congress on this modified system of records.

Matthew Ramsey,

Head of Privacy and Disclosure Policy, Law and Policy.

SYSTEM NAME AND NUMBER:

Master Files of Social Security Number (SSN) Holders and SSN Applications, 60–0058.

SECURITY CLASSIFICATION:

Unclassified.

SYSTEM LOCATION:

Social Security Administration, Chief Information Officer, Systems Operations and Hardware Engineering, Robert M. Ball Building, 6401 Security Boulevard, Baltimore, MD 21235–6401.

Information is also located in additional locations in connection with cloud-based services and as backup for business continuity purposes.

SYSTEM MANAGER(S):

Social Security Administration, Head of Income Security Programs, Law and Policy, 6401 Security Boulevard, Baltimore, MD 21235–6401, (410) 966–5855.

AUTHORITY FOR MAINTENANCE OF THE SYSTEM:

Sections 205(a) and 205(c)(2) of the Social Security Act, as amended.

PURPOSE(S) OF THE SYSTEM:

We use information in this system to assign SSNs and for a number of administrative and program purposes, including but not limited to: for various Old Age, Survivors, and Disability Insurance (OASDI), Supplemental Security Income (SSI), and Medicare/Medicaid claims purposes; as a case control number; as a secondary beneficiary cross-reference control number for enforcement purposes; for verification of individual identity

factors; and for other claims purposes related to establishing benefit entitlement. We use information in this system:

- for the general administration of the Social Security Act to ensure the accuracy of enumeration related information in other SSA systems;
- to prevent the processing of an SSN card application for a person whose application we identified was supported by evidence that either:
 - we suspect may be fraudulent and we are verifying evidence, or
 - we determined to be fraudulent information;
- to record accurate earnings information to the correct individual;
- to prevent issuance of multiple SSNs to a person;
- for resolution of earnings discrepancy cases; and
- for research and statistical activities.

CATEGORIES OF INDIVIDUALS COVERED BY THE SYSTEM:

This system contains a record of each person who has applied for and to whom we have assigned an SSN. This system also contains records of each person who applied for an SSN, but to whom we did not assign one for one of the following reasons: (1) the application was supported by documents that we suspect may be fraudulent and we are verifying the documents with the issuing agency; (2) we have determined the person submitted fraudulent documents; (3) we do not suspect fraud but we need to further verify information the person submitted or we need additional supporting documents; or (4) we have not yet completed processing the application.

CATEGORIES OF RECORDS IN THE SYSTEM:

We collect applications for SSNs. This system contains all of the information we received on the applications for SSNs (e.g., name, date and place of birth, sex identification, both parents' names, reference number, and alien registration number) and all information obtained during the processing of the SSN request. The system also contains:

- changes in the information on the applications the SSN holders submit;
- information from applications supported by evidence we suspect or determine to be fraudulent, along with the mailing addresses of the persons who filed such applications and descriptions of the documentation they submitted;
- cross-references when multiple numbers have been issued to the same person;

- a form code that identifies the Form SS-5 (Application for a Social Security Card Number) as the application the person used for the initial issuance of an SSN, or for changing the identifying information (*e.g.*, a code indicating original issuance of the SSN, or that we assigned the person's SSN through our enumeration at birth program);
- a citizenship code that identifies the number holder's status as a U.S. citizen or the work authorization of a non-citizen;
- a special indicator code that identifies types of questionable data or special circumstances concerning an application for an SSN (*e.g.*, false identity; illegal alien; scrambled earnings);
- an indication that an SSN was assigned based on harassment, abuse, or life endangerment;
- an indication that a person has filed a benefit claim under a particular SSN; and
- other indicators needed to process SSN requests.

RECORD SOURCE CATEGORIES:

We obtain information in this system of records from SSN applicants (or persons acting on their behalf), as well as Federal, State, and local agencies.

ROUTINE USES OF RECORDS MAINTAINED IN THE SYSTEM, INCLUDING CATEGORIES OF USERS AND PURPOSES OF SUCH USES:

We will disclose records pursuant to the following routine uses; however, we will not disclose any information defined as "return or return information" under 26 U.S.C. 6103 of the Internal Revenue Code (IRC), unless authorized by a statute, the Internal Revenue Service (IRS), or IRS regulations.

1. To employers (or agents on their behalf) in order to complete their records for reporting wages to us pursuant to the Federal Insurance Contributions Act and section 218 of the Social Security Act.
3. To the Department of Justice (DOJ), for investigating and prosecuting violations of the Social Security Act.
4. To Department of Homeland Security (DHS), upon request, to identify and locate aliens in the United States pursuant to section 290(b) of the Immigration and Nationality Act (8 U.S.C. 1360(b)).
5. To the Railroad Retirement Board (RRB), for the purpose of administering provisions of the Social Security Act relating to railroad employment and for administering the Railroad Unemployment Insurance Act.
6. To the Department of the Treasury, for:

- (a) tax administration as defined in section 6103 of the IRC (26 U.S.C. 6103);
- (b) investigating the alleged theft, forgery, or unlawful negotiation of Social Security checks; and
- (c) administering those sections of the IRC that grant tax benefits based on support or residence of children. As required by section 1090(b) of the Taxpayer Relief Act of 1997, Public Law 105-34, this routine use applies specifically to the SSNs of parents shown on an application for an SSN for a person who has not yet attained age 18.
7. To a congressional office in response to an inquiry from that office made on behalf of, and at the request of, the subject of the record.
8. To the Department of State (DOS) for administering the Social Security Act in foreign countries through its facilities and services.
9. To the American Institute, a private corporation under contract to DOS, for administering the Social Security Act in Taiwan through facilities and services of that agency.
10. To the Department of Veterans Affairs (VA), Regional Office, Manila, Philippines, for the administration of the Social Security Act in the Philippines and other parts of the Asia-Pacific region through services and facilities of that agency.
11. To the Department of Labor (DOL) for administering provisions of Title IV of the Federal Coal Mine Health and Safety Act, as amended by the Black Lung Benefits Act, and for studies on the effectiveness of training programs to combat poverty.
12. To VA:
 - (a) to validate SSNs of compensation recipients/pensioners so that VA can release accurate pension/compensation data to us for Social Security program purposes; and
 - (b) upon request, for purposes of determining eligibility for, or amount of VA benefits, or verifying other information with respect thereto.
13. To Federal agencies that use the SSN as a numerical identifier in their record-keeping systems for the purpose of validating SSNs.
14. To DOJ, a court or other tribunal, or another party before such court or tribunal, when:
 - (a) SSA, or any component thereof; or
 - (b) any SSA employee in the employee's official capacity; or
 - (c) any SSA employee in the employee's individual capacity where DOJ (or SSA, where it is authorized to do so) has agreed to represent the employee; or
 - (d) the United States or any agency thereof where we determine the

litigation is likely to affect SSA or any of its components, is a party to the litigation or has an interest in such litigation, and SSA determines that the use of such records by DOJ, a court or other tribunal, or another party before the tribunal is relevant and necessary to the litigation, provided, however, that in each case, we determine that such disclosure is compatible with the purpose for which the records were collected.

15. To State audit agencies for the purpose of:

(a) auditing State supplementation payments and Medicaid eligibility considerations; and

(b) expenditures of Federal funds by the State in support of the Disability Determination Services.

16. To the Social Security agency of a foreign country to carry out the purpose of an international social security agreement entered into between the United States and the other country, pursuant to section 233 of the Social Security Act.

17. To Federal, State, or local agencies (or agents on their behalf) for administering income or health maintenance programs, including programs under the Social Security Act. Such disclosures include the release of information to the following agencies, but are not limited to:

(a) RRB, for administering provisions of the Railroad Retirement Act and Social Security Act, relating to railroad employment, and for administering provisions of the Railroad Unemployment Insurance Act;

(b) VA, for administering 38 U.S.C. 1312, and upon request, for determining eligibility for, or amount of, veterans' benefits or for verifying other information with respect thereto pursuant to 38 U.S.C. 5106;

(c) DOL, for administering provisions of Title IV of the Federal Coal Mine Health and Safety Act, as amended by the Black Lung Benefits Act.

18. To State welfare departments:

(a) pursuant to agreements with us, for the administration of State supplementation payments;

(b) for enrollment of welfare beneficiaries for medical insurance under section 1843 of the Social Security Act; and

(c) for conducting independent quality assurance reviews of SSI beneficiary records, provided that the agreement for Federal administration of the supplementation provides for such an independent review.

19. To third party contacts (*e.g.*, State bureaus of vital statistics and DHS) that issue documents to persons when the third party has, or is expected to have,

information that will verify documents when we are unable to determine if such documents are authentic.

20. To DOJ, Criminal Division, Human Rights and Special Prosecutions Section, upon receipt of a request for information pertaining to the identity and location of aliens for the purpose of detecting, investigating and, where appropriate, taking legal action against suspected participants in Nazi persecution, genocide, and torture or extra judicial killings in the United States.

21. To the Selective Service System, for the purpose of enforcing draft registration pursuant to the provisions of the Military Selective Service Act (50 U.S.C. App. § 462, as amended by section 916 of Pub. L. 97–86).

22. To contractors and other Federal agencies, as necessary, for assisting SSA in the efficient administration of its programs. We will disclose information under this routine use only in situations in which SSA may enter into a contractual or similar agreement with a third party to assist in accomplishing an agency function relating to this system of records.

23. To the National Archives and Records Administration (NARA) under 44 U.S.C. 2904 and 2906.

24. To the Office of Personnel Management (OPM) upon receipt of a request from that agency in accordance with 5 U.S.C. 8347(m)(3), to disclose SSN information when OPM needs the information to administer its pension program for retired Federal Civil Service employees.

25. To the Department of Education, upon request, to verify SSNs and to disclose citizenship status concerning applicants who apply to postsecondary educational institutions for financial assistance under Title IV of the Higher Education Act of 1965 (20 U.S.C. 1091).

26. To student volunteers, individuals working under a personal services contract, and other workers who technically do not have the status of Federal employees, when they are performing work for us, as authorized by law, and they need access to personally identifiable information (PII) in our records in order to perform their assigned agency functions.

27. To Federal, State, and local law enforcement agencies and private security contractors, as appropriate, information necessary:

(a) to enable them to ensure the safety of our employees and customers, the security of our workplace, and the operation of our facilities; or

(b) to assist investigations or prosecutions with respect to activities that affect such safety and security or

activities that disrupt the operation of our facilities.

28. To recipients of erroneous Death Master File (DMF) information, to disclose corrections to information that resulted in erroneous inclusion of persons in the DMF.

29. To State vital records and statistics agencies, the SSNs of newborn children for administering public health and income maintenance programs, including conducting statistical studies and evaluation projects.

30. To State motor vehicle administration agencies (MVA) and to State agencies charged with administering State identification card programs for the public to verify names, dates of birth, and Social Security numbers on those persons who apply for, or for whom the State issues, driver's licenses or State identification cards.

31. To entities conducting epidemiological or similar research projects, upon request, pursuant to section 1106(d) of the Social Security Act (42 U.S.C. 1306(d)), to disclose information as to whether a person is alive or deceased, provided that:

(a) we determine, in consultation with the Department of Health and Human Services (HHS), that the research may reasonably be expected to contribute to a national health interest;

(b) the requester agrees to reimburse us for the costs of providing the information; and

(c) the requester agrees to comply with any safeguards and limitations we specify regarding re-release or re-disclosure of the information.

32. To DHS and to employers for the administration of the E-Verify Program, pursuant to Public Law 104–208, section 404(e). We will inform DHS and the employer participating in the E-Verify Program that the identifying data (SSN, name, and date of birth) furnished by an employer concerning a particular employee matches, or does not match, the data maintained in this system of records, and when there is such a match, that information in this system of records indicates that the employee is, or is not, a citizen of the United States.

33. To a State Bureau of Vital Statistics (BVS) that is authorized by States to issue electronic death reports when the State BVS requests that we verify the SSN of a person on whom the State will file an electronic death report after we verify the SSN.

34. To the Department of Defense (DOD) to disclose validated SSN information and citizenship status information for the purpose of assisting DOD in identifying those members of

the Armed Forces and military enrollees who are aliens or non-citizen nationals who may qualify for expedited naturalization or citizenship processing. These disclosures will be made pursuant to requests made under section 329 of the Immigration and Nationality Act, 8 U.S.C. 1440, as executed by Executive Order 13269.

35. To contractors, cooperative agreement awardees, State agencies, Federal agencies, and Federal congressional support agencies for research and statistical activities that are designed to increase knowledge about present or alternative Social Security programs; are of importance to the Social Security program or the Social Security beneficiaries; or are for an epidemiological project that relates to the Social Security program or beneficiaries. We will disclose information under this routine use pursuant only to a written agreement with us.

36. To State and Territory MVA officials (or agents or contractors on their behalf) and State and Territory chief election officials, under the provisions of section 205(r)(8) of the Social Security Act (42 U.S.C. 405(r)(8)), to verify the accuracy of information the State agency provides with respect to applications for voter registration for those persons who do not have a driver's license number:

(a) when the applicant provides the last four digits of the SSN, or

(b) when the applicant provides the full SSN, in accordance with section 7 of the Privacy Act (5 U.S.C. 552a note), as described in section 303(a)(5)(D) of the Help America Vote Act of 2002. (42 U.S.C. 15483(a)(5)(D)).

37. To the Secretary of HHS or to any State, any record or information requested in writing by the Secretary for the purpose of administering any program administered by the Secretary, if we disclosed records or information of such type under applicable rules, regulations, and procedures in effect before the date of enactment of the Social Security Independence and Program Improvements Act of 1994.

38. To appropriate agencies, entities, and persons when:

(a) SSA suspects or has confirmed that there has been a breach of the system of records;

(b) SSA has determined that as a result of the suspected or confirmed breach there is a risk of harm to individuals, SSA (including its information systems, programs, and operations), the Federal Government, or national security; and

(c) the disclosure made to such agencies, entities, and persons is

reasonably necessary to assist in connection with SSA's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm.

39. To State agencies charged with administering Medicaid and the Children's Health Insurance Program (CHIP) to verify personal identification data (*e.g.*, name, SSN, and date of birth) and to disclose citizenship status information to assist them in determining new applicants' entitlement to benefits provided by the CHIP.

40. To HHS, Centers for Medicare and Medicaid Services (CMS), for the purpose of the administration of Insurance Affordability Programs (IAP) and to identify individuals who qualify for an exemption from the individual responsibility requirement in accordance with the Patient Protection and Affordable Care Act of 2010 (Pub. L. 111–148), as amended by the Health Care and Education Reconciliation Act of 2010 (Pub. L. 111–152). IAPs include a Qualified Health Plan through the Exchange, Advance Payments of the Premium Tax Credit, Cost Sharing Reductions, Medicaid, CHIP, and the Basic Health Program.

41. To the Corporation for National and Community Service, upon request, to verify SSNs and to provide citizenship status as recorded in our records concerning individuals applying to serve in approved national service positions and those designated to receive national service education awards under the National and Community Service Act.

42. To another Federal agency or Federal entity, when SSA determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in:

(a) responding to a suspected or confirmed breach; or

(b) preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity (including its information systems, programs, and operations), the Federal Government, or national security, resulting from a suspected or confirmed breach.

43. To State and local government agencies, in situations involving suspected abuse, neglect, or exploitation of minor children or vulnerable adults, to report suspected abuse or determine a victim's eligibility for services.

44. To a State BVS, when it provided SSA information that an individual was deceased to notify the State of the error in the record so furnished.

45. To the Department of Treasury, for purposes of tax administration, debt

collection, and identifying, preventing, and recovering improper payments under federally funded programs and to Federal and State agencies for conducting statistical and research activities, pursuant to sections 202(x) and 1611(e) of the Social Security Act. We will disclose only verified prisoner information (*e.g.*, name, SSN, sex code, and date of birth) under this routine use.

46. To the Office of the President, in response to an inquiry from that office made on behalf of, and at the request of, the subject of the record or a third party acting on the subject's behalf.

47. To HHS, Office of Child Support Enforcement, as required by section 453(e)(2) and (j)(1) of the Social Security Act for the administration of the Federal Parent Locator System.

48. To proper applicants submitting an application for a Social Security Card, when the proper applicants establish that the number holders are physically or mentally unable to file for a Social Security card on their own behalf and provide evidence of custody or legal relationship for the number holders, we may provide the number holders' SSN.

49. To DHS, information regarding the citizenship and immigration status, lawful or unlawful, of any individual pursuant to 8 U.S.C. 1373(a).

50. To the U.S. Department of the Treasury, when disclosure of the information is relevant to review SSA's payment and award eligibility through the Do Not Pay Working System for the purposes of identifying, preventing, or recouping improper payments to an applicant for, or recipient of, Federal funds, including funds disbursed by a state (meaning a state of the United States, the District of Columbia, a territory or possession of the United States, or a federally recognized Indian tribe) in a state-administered, federally funded program. This routine use will be applied when disclosure meets the requirements in 20 CFR 401.150(c).

POLICIES AND PRACTICES FOR STORAGE OF RECORDS:

We will maintain records in this system in paper and in electronic form.

POLICIES AND PRACTICES FOR RETRIEVAL OF RECORDS:

This system maintains information about individuals by SSN, name, date of birth, the agency's internal processing reference number, or alien registration number. If we deny an application because the applicant submitted fraudulent evidence, or if we are verifying evidence we suspect to be fraudulent, we will retrieve records either by the applicant's name plus

month and year of birth, or by the applicant's name plus the eleven-digit reference number of the disallowed application.

POLICIES AND PRACTICES FOR RETENTION AND DISPOSAL OF RECORDS:

In accordance with NARA rules codified at 36 CFR 1225.16, we maintain records in accordance with NARA-approved agency-specific records schedule, N1–47–09–02, item 2, and NARA's General Records Schedule (GRS) 4.2, items 020 and 050, and GRS 5.2, item 010.

ADMINISTRATIVE, TECHNICAL, AND PHYSICAL SAFEGUARDS:

We retain electronic and paper files containing personal identifiers in secure storage areas accessible only by authorized individuals, including our employees and contractors, who have a need for the information when performing their official duties. Security measures include, but are not limited to, the use of codes and profiles, personal identification numbers and passwords, and personal identification verification cards. We restrict access to specific correspondence within the system based on assigned roles and authorized users. We keep paper records in cabinets within secure areas, with access limited to only those employees who have an official need for access in order to perform their duties. We use audit mechanisms to record sensitive transactions as an additional measure to protect information from unauthorized disclosure or modification.

We annually provide authorized individuals, including our employees and contractors, with appropriate security awareness training that includes reminders about the need to protect PII and the criminal penalties that apply to unauthorized access to, or disclosure of, PII (5 U.S.C. 552a(i)(1)). Furthermore, authorized individuals with access to databases maintaining PII must annually sign a sanctions document that acknowledges their accountability for inappropriately accessing or disclosing such information.

RECORD ACCESS PROCEDURES:

Individuals may submit requests for information about whether this system contains a record about them by submitting a written request to the system manager at the above address, which includes their name, SSN, or other information that may be in this system of records that will identify them. Individuals requesting notification of, or access to, a record by mail must include: (1) a notarized

statement to us to verify their identity; or (2) must certify in the request that they are the individual they claim to be and that they understand that the knowing and willful request for, or acquisition of, a record pertaining to another individual under false pretenses is a criminal offense.

Individuals requesting notification of, or access to, records in person must provide their name, SSN, or other information that may be in this system of records that will identify them, as well as provide an identity document, preferably with a photograph, such as a driver's license. Individuals lacking identification documents sufficient to establish their identity must certify in writing that they are the individual they claim to be and that they understand that the knowing and willful request for, or acquisition of, a record pertaining to another individual under false pretenses is a criminal offense.

These procedures are in accordance with our regulations at 20 CFR 401.40 and 401.45.

CONTESTING RECORD PROCEDURES:

Same as record access procedures. Individuals should also reasonably identify the record, specify the information they are contesting, and state the corrective action sought and the reasons for the correction with supporting justification showing how the record is incomplete, untimely, inaccurate, or irrelevant. These procedures are in accordance with our regulations at 20 CFR 401.65(a).

NOTIFICATION PROCEDURES:

Same as records access procedures. These procedures are in accordance with our regulations at 20 CFR 401.40 and 401.45.

EXEMPTIONS PROMULGATED FOR THE SYSTEM:

None.

HISTORY:

90 FR 10025 (February 20, 2025), Master Files of SSN Holders and SSN Applications.

[FR Doc. 2025–19849 Filed 11–10–25; 8:45 am]

BILLING CODE 4191–02–P

DEPARTMENT OF TRANSPORTATION

Federal Aviation Administration

Emergency Order Establishing Operating Limitations on the Use of Navigable Airspace

AGENCY: Department of Transportation, Federal Aviation Administration (FAA).

ACTION: Emergency Order establishing operating limitations on the use of navigable airspace.

SUMMARY: This Order reduces or temporarily prohibits certain operations in the navigable airspace to ensure the safety of aircraft and the efficiency of the National Airspace System (NAS). To maintain the highest standards of safety in the NAS, certain air carriers will be required to reduce by their total daily scheduled domestic operations between 6:00 a.m. and 10:00 p.m. local at each airport by 10 percent, subject to the provisions set forth in this Order, in addition to other operational reductions in the NAS.

DATES: This action is effective November 7, 2025.

ADDRESSES: If you wish to review the background documents or comments received in this proceeding, you may go to <http://www.regulations.gov> at any time and follow the online instructions for accessing the electronic docket. You may also go to the U.S. Department of Transportation's Docket Operations in Room W12–140 on the ground floor of the West Building at 1200 New Jersey Avenue SE, Washington, DC, between 9:00 a.m. and 5:00 p.m., Monday through Friday, except Federal holidays.

FOR FURTHER INFORMATION CONTACT: Al Meilus, Slot Administration and Capacity Analysis, FAA ATO System Operations Services, AJR–G5, Federal Aviation Administration, 800 Independence Avenue SW, Washington, DC 20591; telephone (202) 267–2822; email 7-awa-slotadmin@faa.gov.

SUPPLEMENTARY INFORMATION:

I. Introduction

This Order reduces or temporarily prohibits certain operations in the navigable airspace to ensure the safety of aircraft and the efficiency of the NAS. The Administrator of the Federal Aviation Administration (FAA) is issuing this Order to address safety risks and delays presented by air traffic controller staffing constraints caused by the continued lapse in appropriations. This Order takes effect on November 7, 2025, and will remain in effect until canceled by the FAA.

II. Background

The U.S. Government has exclusive sovereignty over the airspace of the United States.¹ Under this broad authority, Congress has granted the Administrator extensive and plenary authority to ensure the safety of aircraft and the efficient use of the nation's

navigable airspace. In this regard, the Administrator is required to develop plans and policies for the use of navigable airspace and assign by regulation or order under such terms, conditions and limitations as he may deem necessary to ensure its safe and efficient use.² The Administrator may modify or revoke an assignment when required in the public interest.³ Furthermore, in carrying out the Administrator's safety and efficiency responsibilities under the statute, the Administrator must: (1) assign, maintain, and enhance safety and security as the highest priorities in air commerce, and (2) control the use of the navigable airspace and regulate civil operations in that airspace in the interest of the safety and efficiency of those operations.⁴

The FAA's statutory authority to ensure "the safety of aircraft" and "the efficient use of airspace" encompasses its management of the nationwide system of air commerce and the Air Traffic Control (ATC) system. Ensuring the safe and efficient use of the airspace means that the FAA must take all necessary steps to prevent safety risks to, or situations potentially adversely affecting the overall safety of the ATC system for which the FAA is responsible.

Due to a lapse in appropriations, air traffic controllers have been working without pay since October 3, 2025. Since then, the FAA's Office of Aviation Safety (AVS) and Air Traffic Organization (ATO) have continued to review, monitor and evaluate ATC safety. As part of this review, the FAA assessed voluntary safety reports submitted for the month of October. The reports indicated users of the system had concerns about its performance even with current mitigations in place. The FAA has also observed evidence of increased stress on the NAS in aviation safety data, particularly at 40 high traffic airports, identified in Appendix A ("High Impact Airports"). While current mitigations have managed risk, delays are increasing, and additional mitigations are now necessary.

The FAA's initial review of data indicates the system is stressed. With continued delays and unpredictable staffing shortages, which are driving

² 49 U.S.C. 40103(b)(1), as previously codified in 49 U.S.C. App. § 307(a). Title 49 was recodified by Public Law 103–222, 108 Stat. 745 (1994). The textual revisions were not intended to result in substantive changes to the law. The recodification stated that the words in § 307(a) "under such terms, conditions, and limitations as he may deem" were omitted as surplus. H. Rpt. 103–180 (103d Cong., 1st Sess. 1993) at 262.

³ *Id.*

⁴ 49 U.S.C. 40101(d)(1) and (4).

¹ 49 U.S.C. 40103.

**Comments on
Social Security Administration
Privacy Act of 1974; System of Records
Notice of a modified system of records
Published October 31, 2025**

**Submitted by
Maya A. Bernstein
Washington, DC
December 12, 2025**

These comments are submitted in response to notice in the *Federal Register*, Docket No. SSA–2025–0225, 90 Fed. Reg. 50879, on November 12, 2025. They represent my own thoughts only and do not represent those of any other person or organization.¹

General Comments

There are many purposes of publishing a description of a system of records under the Privacy Act of 1974 in the *Federal Register*, but the main purpose is to describe the nature and character of the records an agency collects, for what purposes an agency collects them, from where the agency derives its authority, how the records are maintained, what use will be made of them, and until when they will be maintained or destroyed. The Social Security Administration’s (SSA’s) notice does not adequately address these requirements.

This system of records notice (SORN), as amended, describes the maintenance of records about every individual in the entire workforce of the United States, many non-working people who receive benefits, most every person born in the United States after 1987 when SSA began the Enumeration at Birth program in order to prevent tax fraud (including many people who have yet to reach the age of majority), and individuals who have applied for a social security number (SSN), but to whom one was not assigned. All told, the number of individuals to whom this system applies is easily over 300 million.

This notice seems to be a response to litigation brought following June revelations in the news that the Department of Homeland Security (DHS) had significantly expanded its use of Social Security records for the purpose of assisting states in verifying eligibility to vote. SSA published this notice months after the start of the program by Homeland Security, and therefore the notice cannot, under 5 USC § 552a(e)(4), give legal cover to disclosures made prior to December 12, 2025, the earliest date that a routine use (an administratively added disclosure outside of SSA) may be effective under the Privacy Act.

¹ For identification purposes, it may be helpful to know that I was the lead on the Privacy Act at the Office of Management and Budget from 1990-1999; the Privacy Advocate of the IRS from 2003-2004; and for 20 years prior to August 2025, the Senior Advisor for Privacy at the Department of Health and Human Services.

months before publication of this notice, apparently starting in May 2025. Knowingly collecting, maintaining, and sharing data outside of the restrictions of a system of records notice published in advance of these actions are all potential criminal violations under 5 U.S.C. 552a(i).

This notice should be read together with the notice published by DHS at 90 Fed. Reg. 48948, on October 31, 2025, expanding the Systematic Alien Verification for Entitlements program (SAVE). This notice makes clear that although, prior to the expanded program with Homeland Security, SSA would share the data about permanent resident aliens or individuals present in the United States under a visa that conferred work-authorization, this notice permits disclosure of all records in SSA's Master File to the SAVE program at DHS.

Homeland Security now proposes to expand sharing of data it obtains from SSA with states, not just using alien registration numbers from Social Security, but the entire Social Security database, which by the Social Security Administration's own admission during the current Administration, is not appropriate for use in determining citizenship or immigration status but is merely used as an indication of work authorization.

Social Security Numbers (SSNs) are issued pursuant to the Social Security Act, permitting the SSA to maintain accurate wage and earnings information in order to administer Social Security programs. 42 U.S.C. § 405(c)(2)(A), (B). SSNs must be issued to noncitizens who are eligible to work and, therefore, are not recognition of citizenship.²

The enormous expansion of data sharing represented by these two notices is exactly the sort of activity that the Congress attempted to prevent when it passed the Privacy Act of 1974. Leading up to the Act's passage, Congress was concerned about the creation of huge, comprehensive databanks of individuals. The legislative history of the Privacy Act makes clear that the Congress wanted to prevent the creation of "formal or de facto national databanks, "centralized Federal information systems," and "interagency computer data banks," so that it would be "legally impossible for the Federal Government in the future to put together anything resembling a '1984' personal dossier on a citizen."³

It is not clear what lawful purpose would be accomplished by expanding disclosure to DHS of US citizens by birth, none of whom should be disqualified for federal benefit or loan programs, nor from voter registration in any state. This represents a huge expansion of the use of individual data for a purpose unrelated to DHS authorities or its own program needs, with many concomitant risks. And yet, DHS also gives notice that once it has these data, it will share them within DHS to carry out "national security, law enforcement, immigration, intelligence, or other homeland security functions," unrelated to the original purposes of this system of records. In other words, DHS and SSA seem to be using their statutory authorities to disclose data to support

² 42 U.S.C. § 405(c)(2)(B)(f)(I), (III); *see also* 20 C.F.R. § 422.104(a)." [Guidance on Protecting the Meaning and Value of American Citizenship (Executive Order 14160) for Verification Requirements under the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, *available at* <https://www.ssa.gov/sites/g/files/npxnvu131/files/2025-07/SSA%20Guidance%20Document%20-%20EO%2014160.pdf>]

³ S. Comm. on Gov't Operations and H.R. Comm. on Gov't Operations, 94th Cong., 2d Sess., Legislative History of the Privacy Act of 1974 – S. 3418 (Pub. L. No. 93-579), Source Book on Privacy at 168 (1976), *available at* <https://perma.cc/9W9F-R5ZL> ("Privacy Act Legis. History").

other agencies' program needs for social security verification and immigration status and turning the sharing into an opportunity instead for Homeland Security to amass data resources for its internal enforcement programs where it would otherwise have no justification for collection without a specific, articulable, individual case. This bypasses several requirements of the Privacy Act, particularly the requirements in 5 USC § 552a(b)(7), requiring an agency to limit sharing of records for a law enforcement purpose to situations where an agency head such as the Secretary of DHS, makes a written request specifying the particular portion desired and the law enforcement activity for which the record is sought.

These are also exactly the sorts of results the Congress sought to prevent when it passed the Privacy Act of 1974.

Furthermore, Social Security proposes to disclose for verification purposes in some cases only the last four digits of an individual's social security number to conduct matching, even though the last four digits are not unique (indeed, there are only 10,000 possible choices in a database of over 300 million records). This will surely lead to incorrect identification of individuals, higher "hit" rates, unnecessarily increased burden on individuals whose records are matched, and likely voter disenfranchisement in the case of SAVE, or inappropriate denial or termination of federal benefits in the case of many other benefit and loan programs at the federal and state level who rely on SSA data.

One of the stated purposes of updating the routine uses in this notice was to permit disclosure of citizenship and immigration information to DHS. However, the fact that DHS published its notice months after the program expansion began, and SSA's own notice permitting disclosure came even 12 days later, indicates that the multi-agency data sharing involved in the SAVE program was not properly coordinated so that agencies would come into compliance together before the program started.

The staggered notices are an indication that DHS failed to conduct the required coordination appropriate to an expansion of its program at this scale. This lack of coordination makes it likely that while DHS and SSA remain out of compliance, other agencies will have also violated the Privacy Act in continuing to participate in the SAVE program themselves. Even if it were appropriate to expand its program in the way described by DHS, agencies must be sure that the records they collect, maintain, and disclose can be lawfully shared and used for the stated purposes and that those agencies have published all required Privacy Act notices in advance of the disclosure of any records.

Purposes

The section on purposes lists "enforcement purposes," without any further information about the specific law, regulation, or executive order this phrase is intended to refer. An agency is not permitted to collect information that is not relevant and necessary to its own programs under 5 USC § 552a(e)(1), but it would be helpful for SSA to assure members of the public that it is intended to refer to SSA's enforcement only of its own programs.

SSA also indicates that the system is used to prevent processing of applications that are fraudulent, as if fraud is the only possible reason for an application to be denied. It is likely that very few applications represent fraud, but SSA should include the possibility that individuals sometimes simply make mistakes, transpose digits in their SSNs, don't understand eligibility requirements, or apply erroneously for non-nefarious purposes. Not all errors are fraud.

Categories of Records in the System

I noted in comments on the DHS SAVE system of records notice that DHS claimed that it would collect and maintain Individual Taxpayer Identification Numbers (ITINs) obtained from SSA. However, SSA does not issue ITINs, and therefore ITINs are not listed as a category of records in this system of records; they are assigned by the Internal Revenue Service (IRS).

I note that this section of SSA's notice describes the records as including "a citizenship code that identifier the number holder's status as a U.S. citizen or the work authorization of a non-citizen." Although DHS claims to be obtaining visa status from these records, SSA's system of records indicates that it does not have visa status, only work authorization. These are not the same data, and therefore there is not an appropriate nexus between the problem that DHS is attempting to solve with the SAVE program (understanding visa status), and the SSA data that is available from this system of records (merely work authorization, which could be any of a number of a different visa statuses).

It would be helpful to the public in commenting on SSA's intentions to expand further on "other indicators needed to process SSN requests." The phrase is too vague to meet the requirements of notice under 5 USC § 552a(e)(4).

Routine Uses

The Privacy Act requires that routine uses identify both the categories of users and the purpose for disclosure.⁴ OMB policy requires that an agency describe the routine use in further detail than required than the statute requires.

Routine uses shall be narrowly tailored to address a specific and appropriate use of the records. Agencies shall describe each routine use with sufficient clarity and specificity to ensure that members of the public who are unfamiliar with the system or the agency's program can understand the uses to which the records are subject. Overly broad or ambiguous language would undermine the purpose of the routine use notice requirement and shall be avoided. A routine use that only applies to certain records in a system of records should indicate its limited scope.⁵

⁴ 5 USC § 552a(e)(4)(D).

⁵ Office of Management and Budget Circular A-108, 6.k., at 11 (Dec 2016), *available at* https://www.whitehouse.gov/wp-content/uploads/legacy_drupal_files/omb/circulars/A108/omb_circular_a-108.pdf; See OMB, Reissuance of OMB Circular No. A-108, "Federal Agency Responsibilities for Review, Reporting, and Publishing under the Privacy Act, 81 Fed. Reg. 94424 (Dec. 23, 2016); *see also* Privacy Act Implementation: Guidelines and Responsibilities, 40 Fed. Reg. 28,948, 28,963 (July 9, 1975), *available at* http://www.whitehouse.gov/sites/default/files/omb/assets/omb/inforeg/implementation_guidelines.pdf.

Furthermore, since routine uses have the potential to expand statutorily permissible disclosures that the Congress perhaps could not anticipate when it enacted the law, potentially without limit, the Congress required an administrative process to effectuate a routine use including 30 days' notice in the *Federal Register* to afford an opportunity for public comment.

The introductory material SSA has included in the section on Routine Uses indicates that SSA will not disclose tax "return or return information. . . unless authorized. . . "by a statute. . . ." Presumably SSA intends that to be a federal statute, since complying with state laws to disclose in violation of the Internal Revenue Code might implicate sovereignty issues. Although SSA is not required to include this statement at all, it is useful to include if it is clear that only federal statutes would provide the necessary authority.

First, SSA should note the routine uses are misnumbered. There is no Routine Use 2.

The Routine Use labeled 3 is problematic because it is not clear under what circumstances disclosure to DOJ would be appropriate. Under the DC Circuit decisions in *Doe v. diGenova* and *Doe v. Stephens*,⁶ it is inappropriate to either reproduce a statutorily provided exception or to water down an exception provided by statute. Since the Privacy Act already provides a statutory provision that permits a law enforcement entity to request records under (b)(7), this routine use is not appropriate where such a request is possible.

Another possibility is that Routine Use 3. refers to an occasion where SSA knows of a violation of law that should properly be referred to the appropriate law enforcement entity, but the entity is not aware of the violation so cannot make a (b)(7) request. In such a case, there exists model language many agencies use to ensure they comply with the ruling in *Covert v. Harrington*.⁷ A typical example might be worded like this:

To an appropriate federal, state, tribal, local, international, or foreign law enforcement agency or other appropriate authority charged with investigating or prosecuting a violation or enforcing or implementing a law, rule, regulation, or order, when a record, either on its face or in conjunction with other information, indicates a violation or potential violation of law, which includes criminal, civil, or regulatory violations and such disclosure is proper and consistent with the official duties of the person making the disclosure.⁸

Routine Use 4. Seems to be the one SSA would rely on to make disclosures to DHS in the SAVE program. However, it also states that the disclosures would be made on request, an indicate enforcement of the Immigration and Nationality Act. As indicated above, in the case where a law enforcement entity such as DHS can make a request for records to another agency, the law

⁶ See generally *Doe v. DiGenova*, 779 F.2d 74 (D.C. Cir. 1985) (discussed in the DOJ Privacy Act Overview: 2020 Edition, under the discussion for (b)(7)), available at <https://www.justice.gov/opcl/overview-privacy-act-1974-2020-edition/disclosures-third-parties#b7>.

⁷ See *Covert v. Harrington*, 876 F.2d 751, 753-54 (9th Cir. 1989).

⁸ See DHS, Privacy Act of 1974; System of Records; Notice of a modified system of records, 85 Fed. Reg. 64511, 64513 (Oct. 13, 2020) available at <https://www.govinfo.gov/content/pkg/FR-2020-10-13/pdf/2020-22536.pdf>

enforcement entity is obligated to use the statutorily provided method of requesting records under (b)(7) and to follow all of the attendant procedures of the statute. It may not duplicate or water down those procedures by attempting to bypass the Congressional intent with a routine use. Therefore, this routine use is improper and should be withdrawn.

Moreover, even in the case that this routine use were found proper, the authority on which it is based, 8 USC § 1373(a), is a federal statute that prohibits local and state governments and agencies from enacting laws or policies that limit communication with Immigration & Customs Enforcement (ICE) or Customs and Border Protection (CBP). It does provide any affirmative duty to disclose to DHS. In reading this statute together with the Privacy Act, and using basic rules of statutory construction, one should try to give effect to both statutes. Whereas the Privacy Act prohibits disclosure, and Title 8 does not require disclosure, I do not believe it can override the prohibition in the Privacy Act that requires individual consent by covered individuals (citizens and permanent resident aliens). In either case, the routine use should be withdrawn.

Routine Use 7. would permit disclosure to a congressional office by a mere verbal request from a Congressional staff member to SSA. This is insufficient to protect individuals whose records would be disclosed to the legislative branch, after which the records would no longer be covered by the Privacy Act or any privacy law. The routine use should require that the inquiry be made at the *written* request of the subject individual, so that the written request (even if not a formal Privacy Act request) may be presented to SSA as proof of an actual inquiry, protecting both the individual and SSA. For example, a Congressional office could otherwise make a request for records about a constituent who, unbeknownst to SSA, also happens to be the Member's opponent in an upcoming race. This would be an unseemly misuse of the routine use to the disadvantage of SSA and the individual whose records are protected.

Routine Use 14. Seems to have commingle three "standard" routine uses that agencies employ to disclose to (1) DOJ when DOJ represents the agency or certain parties in litigation, (2) to a court or other tribunal before which the agency appears, and (3) discovery requests to another party. Responding to discovery requests is not appropriate under a routine use, and the DOJ Privacy Act Overview⁹ discusses at length that this type of disclosure should be done using the statutorily

⁹ See DOJ, Privacy Act Overview 2020 Edition, "Disclosure to Third Parties," discussion reproduced here for convenience, available at <https://www.justice.gov/opcl/overview-privacy-act-1974-2020-edition/disclosures-third-parties#b3>

Although courts have unanimously held that the Privacy Act does not create a privilege against discovery, an agency can disclose Privacy Act-protected records if permitted by the Act. The most appropriate method of disclosure in this situation may be pursuant to a subsection (b)(11) court order. See generally *Doe v. DiGenova*, 779 F.2d 74 (D.C. Cir. 1985); *Doe v. Stephens*, 851 F.2d 1457 (D.C. Cir. 1988) (both discussed below under subsection (b)(11)). Indeed, the courts that have rejected the Privacy Act as a discovery privilege have referenced subsection (b)(11)'s allowance for court-ordered disclosures. See *Laxalt*, 809 F.2d at 888-89; *Weahkee*, 621 F.2d at 1082; *Garraway v. Ciufu*, No. 117CV00533DADGSAPC, 2020 WL 1263562, at *8 (E.D. Cal. Mar. 16, 2020) (records that might otherwise be protected by the Act may still be discovered through litigation if ordered by a court); *Lightsey v. Potter*, No. 1:04-CV-3110-ODE, 2006 WL 8431955 (N.D. Ga. July 27, 2006); *Hernandez v. United States*, No. 97-3367, 1998 WL 230200, at *2-3 (E.D. La. May 6, 1998); *Forrest*, 1996 WL 171539, at *2; *Ford Motor Co.*, 825 F. Supp. at 1082-83; *Clavir*, 84 F.R.D. at 614; cf. *Alford v. Todco*, No. CIV-88-731E, slip op. at 4-5 (W.D.N.Y. June 12, 1990) (ordering production of records and concluding that "[e]ven

provided (b)(11) disclosure in response to a court order instead. In practice, the parties get together and sign an agreement, possibly with a request for a protective order in respect of the privacy of the individual(s) involved. Once signed by a federal judge, it falls properly under (b)(11).

Routine Use 17(a) seems to duplicate Routine Use 5.

Routine Use 17(b) seems to duplicate Routine Use 12.

Routine Use 17(c) seems to overlap significantly with Routine Use 11.

Routine Use 20. Suffers from the same problem as Routine Use 4, because this routine use states that it would be for a law enforcement purpose “on request.” Such a disclosure should only be made under 5 USC § 552a(b)(7). This routine use should be withdrawn.

Routine Use 27(b) also suffers from the same defects as Routine Use 3, in which it is not clear whether a (b)(7) request is possible, or whether a more narrowly tailored routine use that follows the standard examples to comply with *Covert v. Harrington* is appropriate.

Routine use D. is too general to be helpful. It seems to permit an agency disclose any authorized audit but does not indicate what types of agencies or audits are contemplated, does not list the possible purposes for these audits as required by the Privacy Act, and does not narrowly tailor the possible disclosure as required by OMB guidance. This routine use is too vague to permit appropriate public comment as contemplated by the Privacy Act.

assuming the Privacy Act supplies a statutory privilege . . . the plaintiff has waived any such privilege by placing his physical condition at issue”); Tootle v. Seaboard Coast Line R.R., 468 So. 2d 237, 239 (Fla. Dist. Ct. App. 1984) (recognizing that privacy interests in that case “must give way to the function of the discovery of facts” and that subsection (b)(11) provides the mechanism for disclosure).