

Privacy Impact Assessment Update for the

U.S. Customs and Border Protection I-94 Website Application

DHS/CBP/PIA-016(a)

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Abstract

U.S. Customs and Border Protection (CBP) issues Form I-94 as documentation of the approved length of stay and departure for nonimmigrant aliens entering the United States. Since 2013, CBP has made a number of enhancements to the I-94 issuance process, including automation of the form in the air and sea environment and a website that allows travelers to access and print their I-94 admission records. CBP is issuing this updated Privacy Impact Assessment (PIA) to describe new enhancements to the I-94 website that involve new uses of personally identifiable information (PII), including: (1) the use of the website to allow nonimmigrant aliens to access the past five years of their own border crossing records; (2) pre-payment for individuals entering the United States at land ports of entry; and (3) traveler compliance checks.

Overview

DHS issues Form I-94 (Arrival/Departure Record)¹ to certain nonimmigrant aliens upon arrival in the United States or when they change status in the United States. DHS uses the form to document the traveler's arrival and departure and provides evidence of the terms of the traveler's admission or parole² into the United States. Nonimmigrant aliens visiting the United States often use the I-94 (admission) number for documentation of status while in the United States when completing certain applications, such as those required to obtain a driver's license, benefits from state public assistance agencies/organizations, a Social Security card, or a change of status from U.S. Citizenship and Immigration Services (USCIS).

As described in the previous Form I-94 Automation PIA,³ CBP automated the Form I-94 in May 2013 in the air and sea environment for all travelers with the exception of asylees and certain parolees. The refugee I-94 process was later automated in September 2015. The automated I-94 can be accessed by a traveler on the CBP.gov public website.⁴ All I-94 arrival and departure records are entered into the Nonimmigrant Information System (NIIS).⁵

 $^{^1 \}textit{See} \ \underline{\text{https://www.cbp.gov/sites/default/files/documents/CBP\%20Form\%20I-94\%20English\%20SAMPLE} \ Watermark.pdf.$

² Parole allows an individual, who may be inadmissible or otherwise ineligible for admission into the United States, to be paroled into the United States for a temporary period. The Immigration and Nationality Act (INA) grants the Secretary of Homeland Security the discretion to parole any foreign national applying for admission into the United States temporarily for urgent humanitarian reasons or significant public benefit. (*See* INA section 212(d)(5)). Parole does not constitute an admission to the United States.

³ See DHS/CBP/PIA-016 U.S. Customs and Border Protection Form I-94 Automation, available at www.dhs.gov/privacy.

⁴ See "Get your I-94 Admission Number" available at https://www.cbp.gov.

⁵ See DHS/CBP-016 Nonimmigrant Information System, 80 FR 13398 (March 13, 2015). NIIS is a subsystem housed on the CBP TECS platform; see DHS/CBP/PIA-021 TECS System: Platform (August 2016), available at www.dhs.gov/privacy.



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Reason for the PIA Update

This PIA update describes the I-94 website's new features that: 1) allow nonimmigrant aliens to access their border crossing history from the past five years; 2) allow individuals entering the United States at land ports of entry to pay their I-94 processing fee in advance; and 3) assist in notifying certain travelers of information related to their likely status in the United States. Expanding the use of the I-94 website allows nonimmigrants to immediately obtain the entry and exit records they need to efficiently request the benefits they need, such as Social Security and employment benefits, without the need to submit a Freedom of Information Act (FOIA) request.

Accessing the Website for I-94 Access, Payment, and Travel History

CBP expanded the I-94 website to give nonimmigrant U.S. aliens access to the past five years of their own entry and exit records stored in the Nonimmigrant Information System (NIIS).⁶ The travel history query is a tool for travelers to view and record their past crossings of the U.S. border. Many benefit granting agencies or employers require documentation, whether self-reported or official records, of foreign travel to determine eligibility for benefits, continued immigration status, security levels, or employment. To obtain travel history or current I-94 information, the individual must provide the following personal information to the website:

- First and last name;
- Date of birth;
- Passport number; and
- Country of issuance.

Once the individual provides this information, the website returns the dates and U.S. ports of entry where he or she entered and from which he or she departed within the past five years.⁷

In some cases, individuals may have been directed to the I-94 website after submitting a FOIA request to obtain their travel history. On the page displaying the individuals' travel history, the I-94 website provides an option to cancel a FOIA request. Once individuals receive their travel history, they may enter their assigned FOIA request number (which they received electronically after filing the original FOIA request) to close their FOIA request and click the button "Request FOIA Closure," if they are satisfied with the information they received and no longer require CBP to respond to their FOIA request. The I-94 website can generate a list of names from the "Request FOIA Closure" submissions, which may then be encrypted and forwarded to the CBP FOIA department to close those FOIA requests. Individuals are not required to separately request closure

⁶ See DHS/CBP-016 Nonimmigrant Information System, 80 FR 13398 (March 13, 2015).

⁷ Travel history records available on the website are limited to those for which an I-94 was issued, and departure records are only available for confirmed departures.



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of their FOIA requests, and the I-94 website will not forward any information to CBP FOIA unless the individuals provide their FOIA request number and select "Request FOIA Closure."

In accordance with the provisions of 8 U.S.C. § 1367, the I-94 website prohibits the display of information from individuals under certain sensitive or protected classes of admission⁸ on the website. Individuals whose information falls within section 1367 can visit a CBP Deferred Inspection Site to request an I-94 and file a FOIA request for travel history information. USCIS provides CBP with information related to individuals whose information may fall within section 1367 by virtue of their applications with USCIS or subsequent admission through existing information sharing agreements. Moreover, these records are filtered from the website by name, date of birth, and other identifying information (nationality or document country of issuance). In the case of certain sensitive law enforcement paroles, the records are filtered by the class of admission.

Land Border Entry Process

The current land border process differs slightly from the air and sea port process. The automation process for travelers arriving at airports and seaports relies heavily on manifest information submitted by commercial carriers prior to arrival in the United States. But a significant portion of travelers entering at the land border are traveling in personal vehicles and do not submit advance notification of travel plans. Upon arrival at a land border port of entry, travelers who require or request a Form I-94 are processed where a CBP officer collects biometrics, asks any necessary questions, and creates the I-94 record, in part, based on information provided by the traveler. Once processed, CBP collects a \$6 processing fee.

The enhanced I-94 website will allow nonimmigrant aliens entering via the land border to submit their biographic and travel information and pay the fee via the website prior to arrival at the land border port of entry. The collection of the fee and travel information helps reduce the administrative burdens and data entry by CBP officers, creating a more streamlined and efficient process for both the officer and traveler. The I-94 website will redirect the traveler to www.Pay.gov to submit payment. After the fee is received, a provisional I-94 record will be created in the I-94 database. The traveler will be directed back to the I-94 website, which will provide instruction on the next steps. Once the traveler has entered his or her information and submitted payment, he or she will have seven days to appear at a port of entry and to finalize the issuance process. At the port of entry, a traveler will submit biometrics, if required, and complete an interview as part of the normal border inspection process.

⁸ This population includes applicants for or beneficiaries of T Visa (victim of trafficking), U Visa (victim of serious criminal activity), or Violence Against Women Act protections.

⁹ See Treasury Financial Management Service Pay.gov PIA, *available at* https://www.fms.treas.gov/pia/paygov_pia%20.pdf.



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To apply for a land border I-94 and submit the fee in advance, the individual must provide the following personal information found on the paper form I-94:

- First and last name;
- Date of birth;
- Gender;
- Passport number;
- Passport country of issuance;
- Passport date of issuance;
- Passport date of expiration;
- Visa country of issuance (if applicable);
- Visa or Border Crossing Card (BCC) number (if applicable);
- Visa date of issuance;
- Petition number¹⁰ (Optional);
- SEVIS number (Optional);¹¹
- Country of citizenship;
- Country of residence;
- Address in the United States to include city, state, and zip code;
- Telephone number in United States;
- Occupation (Optional); and
- Credit card information for payment.

Overstay Notification

Informing travelers of their likely compliance with the length of their admission is a continuation of CBP's efforts to provide transparency to the public on travel and immigration requirements. CBP has developed a process through which travelers may retrieve their terms of

¹⁰ The petition number is provided by USCIS on an I-797 Form. USCIS uses numerous types of I-797 Forms to communicate with customers or convey an immigration benefit. For more information, please *see* https://www.uscis.gov/i-797-info.

¹¹ Student and Exchange Visitor Information System (SEVIS) is a web-based system for maintaining information on international nonimmigrant students and exchange aliens in the United States. The number is issued to students for status verification purposes. For more information on SEVIS, please *see* DHS/ICE/PIA-001 Student and Exchange Visitor Information System (SEVIS), *available at* www.dhs.gov/privacy.



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admission compliance status on the I-94 website.¹² Notification to the traveler, which builds on advances in exit reporting that support accurate overstay identification, is the next step in ensuring that travelers comply with their terms of admission. CBP identifies "overstay travelers" as those who have left the United States after the date of their authorized period of stay, referred to as "Out of Country Overstays," and notifies these travelers via their specified email address that they may need to check the I-94 public website to verify travel compliance. The website indicates the number of days overstay travelers have overstayed and provides instructions on further actions travelers can pursue after being identified as an overstay traveler.

CBP will implement overstay notification in phases. The Phase I travel population consists of Visa Waiver Program (VWP) Out of Country Overstays, who CBP will notify via two emails. First, the Electronic System for Travel Authorization (ESTA) System¹³ will send an email to inform the traveler about the change in ESTA status and prompt the traveler to check his or her application status on the ESTA website. The second email will prompt the traveler to check compliance on the I-94 website, which provides compliance status upon verification of identity. In Phase II, CBP will expand overstay notifications to the Electronic Visa Update System (EVUS),¹⁴ Student and Exchange Visitor Information System (SEVIS),¹⁵ Business and Pleasure, and additional admission classes. The travelers will provide the same information used for Phase I to access their compliance status. CBP may expand the overstay notification program to additional populations, and will also begin email notification to travelers 10 days prior to the end of their authorized stay in the United States, which will also prompt them to check the I-94 public website.

To obtain overstay status information, the individual must provide the following personal information:

- First and last name;
- Date of birth;
- Passport number; and
- Passport country of issuance.

¹² CBP generates overstay status indicators using the Arrival and Departure Information System (ADIS) and manually vets these results for further confirmation. For more information, please *see* DHS/CBP/PIA-024 Inclusion of Form I-94 Data in the Arrival and Departure Information System (ADIS), *available at* www.dhs.gov/privacy, and DHS/CBP/PIA-024(b) Arrival and Departure Information System, *available at* www.dhs.gov/privacy.

¹³ See DHS/CBP/PIA-007 Electronic System for Travel Authorization, available at www.dhs.gov/privacy.

¹⁴ See DHS/CBP/PIA-033 Electronic VISA Update System, available at www.dhs.gov/privacy.

¹⁵ See DHS/ICE/PIA-001 Student Exchange Visitor Information System, available at www.dhs.gov/privacy.



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Fair Information Practice Principles (FIPPs)

The Privacy Act of 1974 articulates concepts of how the Federal government should treat individuals and their information and imposes duties upon Federal agencies regarding the collection, use, dissemination, and maintenance of personally identifiable information. The Homeland Security Act of 2002 Section 222(a)(2) states that the Chief Privacy Officer shall assure that information is handled in full compliance with the fair information practices as set out in the Privacy Act of 1974.

In response to this obligation, the DHS Privacy Office developed a set of Fair Information Practice Principles (FIPPs) from the underlying concepts of the Privacy Act to encompass the full breadth and diversity of the information and interactions of DHS. The FIPPs account for the nature and purpose of the information being collected in relation to DHS's mission to preserve, protect, and secure.

DHS conducts PIAs on both programs and information technology systems, pursuant to the E-Government Act of 2002 Section 208 and the Homeland Security Act of 2002 Section 222. Given that the I-94 Website Automation is a phased program, rather than a particular information technology system, this PIA is conducted as it relates to the DHS construct of the Fair Information Principles. This PIA examines the privacy impact of the modifications to the I-94 website as they relate to the Fair Information Principles.

1. Principle of Transparency

Principle: DHS should be transparent and provide notice to the individual regarding its collection, use, dissemination, and maintenance of PII. Technologies or systems using PII must be described in a SORN and PIA, as appropriate. There should be no system the existence of which is a secret.

CBP continues to provide arriving travelers with information about the I-94 website through press releases, signage, and industry outreach. Similarly, the addition of the overstay notification feature is a continuation of CBP's efforts to provide more transparency regarding CBP's processes and provide travelers with the ability to access their information. The I-94 website itself contains a prominent link to the privacy policy and to CBP PIAs and System of Record Notices (SORN). When a traveler chooses to enter the I-94 website, he or she is advised that he or she is seeking access to records contained in NIIS.

Prior to entering any information, the individual is provided with a privacy notice and a link to the DHS/CBP privacy policy located at the top of the page. The notice informs the individual of the following:

- DHS/CBP's authority to collect the information;
- The purpose for which the information is being collected;



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- How the information will be used and shared outside DHS;
- Use of the website is voluntary; and
- CBP will retain the search information for three months as part of an audit log.

Also available on the website is a link to frequently asked questions, including information on what records an individual can access, what to do to correct inaccurate departure information, and how to submit a FOIA request. Applicants who are referred to Pay.gov for payment processing are able to view the website privacy policy, which describes what information is collected and for what purpose, the legal authorities for collecting the information, and routine uses.

There are no new risks to transparency related to the automation of the I-94 process for travelers seeking entry at land ports. CBP manages the I-94 website to facilitate transparency. The website provides notice with regard to the collection of information, and CBP continues to provide notice via this PIA and the NIIS SORN published on the DHS website.

2. Principle of Individual Participation

Principle: DHS should involve the individual in the process of using PII. DHS should, to the extent practical, seek individual consent for the collection, use, dissemination, and maintenance of PII and should provide mechanisms for appropriate access, correction, and redress regarding DHS's use of PII.

The I-94 website provides individuals direct access to their travel history, I-94, and compliance information (if applicable). By allowing individuals to conduct searches of their own travel history via the I-94 website, CBP improves individuals' access to their own information, eliminating the need to go through the FOIA process. The privacy policy and notice provided on the website provides just-in-time information for the individual to provide his or her informed consent. Further, use of the website is optional and typically expedites the process at the border, reducing wait and processing times.

Generally, traveler inquiries should be directed to:

CBP INFO Center
OPA - CSC - Rosslyn
U.S. Customs and Border Protection
1300 Pennsylvania Ave, NW
Washington, D.C. 20229

In addition, CBP has updated the address to which individuals should submit their requests for access and correction. Under the Privacy Act, U.S. Citizens and Lawful Permanent Residents may request access to the information they provide that is maintained in the applicable CBP system of records. In addition, all individuals may request access to CBP information under FOIA. Proper written requests under the Privacy Act and FOIA should be addressed to:



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CBP FOIA Headquarters Office U.S. Customs and Border Protection FOIA Division 90 K Street NE, 9th Floor Washington, D.C. 20002

Individuals who have inquiries or seek resolution regarding difficulties they experienced during their travel screening at U.S. transportation hubs - like airports and train stations - or crossing U.S. borders, may apply for redress through the Department of Homeland Security Traveler Redress Inquiry Program (DHS TRIP) at www.dhs.gov/dhs-trip.

<u>Privacy Risk</u>: There is a risk that individuals are not aware of their ability to make record access requests for records in NIIS beyond the I-94 website process, particularly if they want more detailed information.

<u>Mitigation</u>: This risk is mitigated. The purpose of the I-94 website is to enhance individuals' ability to access their travel records. In addition, this PIA describes how individuals can make access requests under the Privacy Act or FOIA. Redress is available for U.S. Citizens and Lawful Permanent Residents through requests made under the Privacy Act as described above. U.S. law prevents DHS from extending Privacy Act redress to individuals who are not U.S. Citizens, Lawful Permanent Residents, or the subject of covered records under the Judicial Redress Act. To ensure the accuracy of CBP's records, CBP may permit access and amendment, regardless of citizenship, on a case-by-case basis, consistent with law.

Privacy Risk: There is a risk that a FOIA request will be improperly closed as a result of the new website functionality.

<u>Mitigation</u>: This risk is mitigated by the fact that the FOIA office is not alerted about an individual accessing the I-94 website unless the individual specifically requests closure. To mitigate the risk that a typographical error could result in someone's request being closed, the CBP FOIA Division will close only those requests where the name and FOIA request number match the name and FOIA request number in the FOIA closure request.

3. Principle of Purpose Specification

Principle: DHS should specifically articulate the authority which permits the collection of PII and specifically articulate the purpose or purposes for which the PII is intended to be used.

The authorities governing the collection or sharing of I-94 information remain the same as the original PIA.

CBP has expanded the use of the I-94 website to include access to travel history, payment processing for land border travelers, and access to compliance information for select traveler populations as described above. These new uses are consistent with CBP's original purpose of



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collection and constitute enhancements to CBP's ability to process incoming travelers and facilitate the traveler's access to relevant information.

4. Principle of Data Minimization

Principle: DHS should only collect PII that is directly relevant and necessary to accomplish the specified purpose(s) and only retain PII for as long as is necessary to fulfill the specified purpose(s). PII should be disposed of in accordance with DHS records disposition schedules as approved by the National Archives and Records Administration (NARA).

To obtain their travel history and information related to overstay status, individuals do not need to provide any additional information beyond the information they would have provided to obtain their most recent I-94.

CBP will collect the individual's FOIA request number only if that individual voluntarily requests that CBP close the open FOIA request for his or her travel history. An audit log records the assigned FOIA request number for those aliens wishing to cancel their FOIA request. The name and assigned FOIA request numbers are compiled from the log and sent to the CBP FOIA Division as described above. This is in addition to the information previously collected and maintained in the audit log, namely: 1) first and last name, 2) date of birth, 3) passport number, 4) country of issuance, and 5) date and time of search.

CBP is seeking National Archives and Records Administration (NARA) approval for a proposed three-month retention period for search histories conducted on the website, after which the records are automatically destroyed. There is no existing record retention schedule for this search history data. Separately, the information currently collected on the I-94 form is sent directly to NIIS and becomes subject to the 75-year NIIS retention schedule or possibly retained longer if linked to active law enforcement records. In addition, the limited number of I-94 paper copies collected at land border ports are entered into the NIIS database, retained for 180 days from the date of departure, and then destroyed.

<u>Privacy Risk</u>: There is a risk that the audit logs will be retained for longer than the three-month period required for operational purposes.

<u>Mitigation</u>: This risk is mitigated by fact that records are automatically rolled off to make space for recent searches. In the unlikely event that an audit log is retained for longer than three months, CBP assesses the associated privacy risk to be minimal.

5. Principle of Use Limitation

Principle: DHS should use PII solely for the purpose(s) specified in the notice. Sharing PII outside the Department should be for a purpose compatible with the purpose for which the PII was collected.



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CBP has expanded the use of the I-94 website to include access to travel history, payment processing for land border travelers, and access to overstay information for select traveler populations as described above.

- *Travel History*: The primary purpose of CBP's collection of information on the I-94 is to serve as documentation of admission. CBP's provision of travel history directly to individuals via the I-94 website may also assist individuals in documenting their status while seeking benefits in the United States. CBP neither collects nor provides access to new information under this practice; rather, it improves the process through which individuals may access their own records.
- Land Border Process: The option to submit land border crossing information in advance for I-94 issuance constitutes primarily a process change to facilitate the traveler screening process and poses no significant changes to the use, collection, or maintenance of information by CBP. Travelers who opt to apply in advance under this process must provide payment information to Pay.gov such as credit card information in order to process this payment; CBP only retains a record of payment.
- Overstay Notification: The use of the website to notify certain travelers of certain information related to the period of their admission is both a new use of the website, as well as a new CBP practice to improve transparency and assist travelers in complying with the terms of their eligibility to travel to the United States. This new activity is nonetheless consistent with CBP's original purpose of collection of I-94 information to document admission to the United States.

These enhancements to the I-94 website are consistent with the original intent of the website and the I-94 automation initiative. CBP is collecting no new information; rather, the I-94 website expansion provides the traveler with easier access to his or her information. The updates also involve minor changes with regard to the CBP FOIA process, since the website distributes requests to close FOIA requests to the CBP FOIA Division, and only upon instruction by the traveler.

Aside from the ability to cancel FOIA requests and the improvements to individual access procedures, CBP has not changed external sharing or disclosure for I-94 information.

<u>Privacy Risk</u>: There is a risk that CBP may use I-94 information for a purpose other than those specified in this and previous PIAs.

<u>Mitigation</u>: This risk is mitigated. CBP is not collecting new information, and is only modifying its existing collection to improve efficiency and provide new methods for individuals to obtain their records from CBP.



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6. Principle of Data Quality and Integrity

Principle: DHS should, to the extent practical, ensure that PII is accurate, relevant, timely, and complete, within the context of each use of the PII.

Allowing travelers crossing the land border to submit their I-94 information in advance helps reduce processing time by CBP at the time of issuance. Further, because travelers submit their information in advance, it is pre-populated in the system, which helps reduce the risk of CBP Officer error related to manual data entry. CBP ensures the accuracy of border crossing records displayed on the I-94 website by validating documents and identity at the time of the crossing.

CBP uses the Arrival and Departure Information System (ADIS) to generate overstay notifications. ¹⁶ CBP employees manually review all ADIS records indicating a traveler overstayed his or her terms of admission to ensure the accuracy of the data. By accessing their information via the I-94 website, individuals can review their information and notify CBP if anything appears to be inaccurate or incomplete.

Privacy Risk: There is a risk that overstay status information displayed on the I-94 website may be inaccurate.

<u>Mitigation</u>: This risk is mitigated. ADIS has a number of built-in controls to ensure that individuals are not improperly identified as overstays. In the event of a system error, CBP analysts review the records to ensure the accuracy of the determination and correct the record or the status as appropriate. In addition, travelers who can now view their status on the website are in a better position to notify CBP of any errors, providing an additional source of feedback to ensure that CBP's information is accurate, timely, and complete.

7. Principle of Security

Principle: DHS should protect PII (in all forms) through appropriate security safeguards against risks such as loss, unauthorized access or use, destruction, modification, or unintended or inappropriate disclosure.

To mitigate the risk of improperly disclosing PII, all records must be accessed by name, date of birth, document number, and country of issuance. When sharing I-94 information with the CBP FOIA Division, only the name and the assigned FOIA request number are shared. CBP encrypts and sends the information to the CBP FOIA Division via the secure intranet.

In order to mitigate the risk relating to email notifications, CBP only provides a referral to the I-94 website. The email language indicates that there may be a change with compliance status

¹⁶ For more information on how ADIS identifies individuals who may have overstayed their visa, please *see* DHS/CBP/PIA-024(b) Arrival and Departure Information System, *available at* https://www.dhs.gov/privacy.



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and to verify the change, the individual should visit the I-94 website. Once on the website, the traveler must enter biographic information to obtain his or her compliance status.

CBP protects information of sensitive or protected classes of admission from appearing on the I-94 website. USCIS sends information on these individuals to CBP, which uses the information to filter and block display of the results on the website, in accordance with the provisions of 8 U.S.C. § 1367. Therefore, a search of an individual whose information is subject to the protections of section 1367 will return a response of "Not Found" on the website. Such individuals may visit a Deferred Inspection Site for an I-94 Form and may file a FOIA request for travel history information.

Privacy Risk: There is a risk that someone could obtain another nonimmigrant alien's travel history using that nonimmigrant alien's information.

<u>Mitigation</u>: This risk is partially mitigated. In order to access his or her travel history, an individual must enter his or her first and last name, date of birth, passport number, and passport country of issuance. There is a possibility that an unauthorized individual who has another person's information may use the website to access his or her travel history using the I-94 website. The privacy risks posed by this possibility are partially mitigated in part by two factors: CBP's restriction of protected class information; and that access to someone's travel history or I-94 alone is not sufficient to use another's person's identity or be granted an immigration benefit.

<u>Privacy Risk</u>: There is a risk that someone could inappropriately access information related to individuals admitted into the United States as a member of a special protected class.

<u>Mitigation</u>: CBP mitigates this risk by ensuring that records are flagged with a protected class indicator. Records flagged accordingly are filtered out and are not visible on the website. The privacy risks posed by this possibility are partially mitigated in part by two factors: CBP's restriction of protected class information; and that access to someone's travel history or I-94 alone is not sufficient to use another's person's identity or be granted an immigration benefit.

8. Principle of Accountability and Auditing

Principle: DHS should be accountable for complying with these principles, providing training to all employees and contractors who use PII, and should audit the actual use of PII to demonstrate compliance with these principles and all applicable privacy protection requirements.

By retaining the search history for three months, CBP will be able to conduct audits and trace unauthorized or improper use of the I-94 website. The audit log is searchable and enables CBP to determine when searches were conducted and what values were entered in the search. For example, if CBP suspects that an individual attempts to access another person's information, CBP can search queries by date, time, and search terms. Although CBP is not able to identify the individual conducting the query based solely on this information, it may assist in an investigation of fraudulent activity.



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There have been no other changes to accountability and auditing since the last PIA.

Responsible Officials

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Approval Signature Page

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