



Privacy Impact Assessment  
for the

**Pre-Arrival Readiness  
Evaluation (PARE) Pilot**

**DHS/CBP/PIA-037**

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## Abstract

The Department of Homeland Security (DHS) U.S. Customs and Border Protection (CBP) is committed to working with state, local, tribal, territorial, and law enforcement entities to secure U.S. borders and work with international governments and organizations to facilitate legal travel and trade. CBP Headquarters and the Buffalo CBP Field Office, in cooperation with the Port of Buffalo and the Buffalo and Fort Erie Public Bridge Authority (PBA), are supporting the deployment of the Pre-Arrival Readiness Evaluation (PARE) pilot program. PARE is an automated traffic management system for commercial vehicles departing Canada, which will be used to optimize traffic flow on the Peace Bridge during a planned three-year bridge resurfacing project. CBP is publishing this Privacy Impact Assessment to provide notice of its cooperative agreement to work with PBA to exchange information of commercial vehicles to determine if commercial fees have been paid and travel documentation has been properly filed to further the efficient movement of commercial vehicles and cargo.

## Overview

In November 2016, the Buffalo and Fort Erie Public Bridge Authority (PBA) will begin a three-year bridge reconstruction project. During the project, traffic to and from Canada to the United States will be reduced to one lane in each direction; private and commercial vehicles will share this same lane crossing the bridge. The goal of the pilot is to optimize U.S. inbound traffic flow on the Peace Bridge during the planned bridge reconstruction project. More specifically, the objectives are to:

- Decrease border congestion and wait times;
- Increase the percentage of prepared commercial drivers/trips<sup>1</sup> approaching CBP Primary Screening;
- Prioritize access to the truck and commercial vehicle lanes at CBP Primary Screening for those prepared commercial drivers/trips; and
- Increase participation in CBP's existing trade programs such as the Decal and Transponder Online and Procurement System (DTOPS).<sup>2</sup>

### *Current Situation*

The Peace Bridge currently has three available traffic lanes: 1) one lane dedicated for traffic

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<sup>1</sup> A "prepared" commercial driver/trip means the drivers have proof that their User Fee has been paid and that their cargo eManifest has been properly filed.

<sup>2</sup> DTOPS is a voluntary DHS program allowing shippers/cargo operators to participate in an expedited pre-clearance process to speed up their entry process through the borders. More information about DTOPS can be found at: <https://dtops.cbp.dhs.gov/main/#>. The responsibility for using DTOPS and uploading shipping information into the Automated Commercial Environment (ACE) via the ACE Portal falls to the shipper/cargo operator of the Commercially-Owned Vehicle, and must be done prior to entering the United States.



departing the United States to Canada; 2) one lane dedicated for traffic entering the United States from Canada; and 3) one alternating middle lane to help relieve congestion during peak crossing times. Commercially-Owned Vehicles (COV) are often backed up over a significant portion of the bridge, blocking access to open Privately-Owned Vehicle (POV) inspection booths or preventing CBP Trusted Travelers from using dedicated inspection booths for those with pre-cleared and expedited privileges.

With the lane reduction, congestion, longer border wait times, and delays at the Peace Bridge are expected to increase for the duration of the project. Therefore, PBA is expecting the PARE concept to be a potential short-term solution identifying alternative methods and software that may facilitate a smoother entry process for commercial/trade and visitor/passenger traffic. At the conclusion of a successful pilot, PARE could be considered for long-term traffic management at the Peace Bridge and at other land Ports of Entry.

### *The PARE Concept*

Prior to arriving at the approach to the Peace Bridge in Canada, a COV driver enters his or her electronic manifest (eManifest) in the Automated Commercial Environment (ACE) Portal and pays the required fee – both of which are linked to the license plate in ACE. When PBA employees see the COV they will use license plate readers/scanners to automatically capture the license plate, if all automation is in place. If automation is not in place, PBA employees will be forced to manually key in the license plate. There are three outcomes following the keying in of the license plate:

- 1) If there is a matching license plate/tag number in ACE, the COV will be waived through.
- 2) If there is a matching license plate/tag number in ACE, but the eManifest, required fee, or both are missing, the truck is moved to the staging lot so the driver can upload the required information.
- 3) If there is no record of the license plate/tag number in ACE, it means the COV is not in the system and the truck is moved to the staging lot so the driver can register and upload the required information.

PARE augments the current process by increasing the number of “prepared” COV travelers arriving at the Primary Screening inspection booths. The PARE pilot is designed to expedite the entry of COVs into the United States and alleviate congestion caused by these vehicles. If successful, the PARE concept may be deployed at other Ports of Entry.

During the PARE pilot, PBA personnel will direct COVs to a staging area located on PBA property on the Canadian side of the Buffalo Port of Entry. In the staging area, PBA personnel will collect COV license plate information. PBA employees will either key in or scan the license plate



(tag number only) using a license plate reader (LPR)<sup>3</sup> device and electronically send to the information to CBP's ACE system. CBP will confirm if the tag number matches an existing entry in ACE to verify that the COV operator has:

1. Paid the vehicle "decal" or "User Fee" as part of the DTOP process; and
2. Uploaded the eManifest<sup>4</sup> to the ACE Portal.

Upon receipt of such information from PBA, CBP will generate a response to PBA ("yes" or "no", and retain only the date and time of the transaction and source IP address). CBP will generate a "yes" response if, based on a review of information previously collected through ACE regarding that shipment, CBP recommends that the vehicle be permitted to cross the bridge and proceed to Primary Screening. If, based on such review, CBP does not believe the shipment is prepared for Primary Screening, it will generate a "no" response indicating that it recommends against PBA permitting the vehicle to cross the bridge. CBP will not share substantive information with PBA.

License plate information is compared to information already on-file<sup>5</sup> in the ACE Portal. The ACE Portal is an online tool that allows users to file Importer Security Filing, eManifests, access financial data (related to fees paid), and run reports in ACE. ACE reports can be used to monitor compliance and show proof that such activities have been carried out as prescribed.

PBA will use this information to prioritize and regulate traffic across the bridge at its discretion. If CBP returns a "yes" response, it means that the DTOP fees have been paid and an eManifest is on file, and the COV driver is directed to cross the bridge. If a "no" response is returned, the driver must move his or her vehicle out of the travel lanes, and is directed to a parking area where a PBA facility is set up with computer terminals/kiosks and Internet access to allow drivers to update the required information. PBA will provide drivers with access to internet-enabled computer workstations and printers to:

- Access, create, or update their DTOPS commercial accounts;
- Pay the required fees and/or file an eManifest; and
- Generate documented proof (i.e., printout their receipt) to satisfy the commercial travel

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<sup>3</sup> PBA is responsible for the scanning process of commercial license plates at the approach to the United States. This process can be carried out by PBA employees who will either manually enter license plate information into their system, or by using electronic License Plate Readers (LPR) to scan license plates; hereafter referred to as "scan," "scanned," or "scanning."

<sup>4</sup> More information about and filing of electronic manifests using the ACE Portal is described in the DHS/CBP/PIA-003 Automated Commercial Environment (ACE) PIA *available at:* [www.dhs.gov/privacy](http://www.dhs.gov/privacy). Information collected by CBP for eManifest filing is outside of the scope for PARE.

<sup>5</sup> License plate information not already on file will generate a "no" response – and that information is not retained. Only transactional information (date and time of the transaction (date/time stamp) and source IP address) are retained, per the DHS Sensitive Systems Policy Directive 4300A.



requirements for entry into the United States.

Once these actions have been completed, the COV can reenter the traffic lanes. Upon review and validation by PBA employees, COVs will be directed across the bridge to CBP Primary Screening lanes.

Regardless of the “yes/no” status returned to PBA following the scan of the COV license plates, limited transactional information, consisting of only a date/time stamp of the request and the source of the transaction (IP address), is retained in CBP’s ACE system audit logs.<sup>6</sup>

Personally Identifiable information (PII) will not be collected, maintained, used, or disseminated using the PBA device. The PBA device will not receive information related to the User Fee and eManifest information – only a “yes” or “no” is passed back to PBA on the device. Log files will not be linked or linkable to the driver, or any other entry information that may be observed or collected at the border.

## *POVs*

POVs will not be permitted in the COV staging area. Signage will be posted to instruct POVs to cross the bridge and prevent them from accessing COV staging lanes. However, if a POV were to inadvertently access the COV staging area, no information will be collected or retained because: 1) the POV would not be registered in the system; 2) the response from an inadvertent scan would be “no”; and 3) PBA personnel will direct the POV driver back into the POV travel lanes.

PARE does not replace or circumvent any part of the current CBP Primary or Secondary Screening or inspection processes<sup>7</sup> for vehicles, cargo, passengers, or drivers.

## **Section 1.0 Authorities and Other Requirements**

### **1.1 What specific legal authorities and/or agreements permit and define the collection of information by the project in question?**

CBP is not collecting new information under this initiative. CBP has the authority to conduct inspections upon entry pursuant to its broad responsibilities and authorities, including the Immigration and Nationality Act, the Tariff Act of 1930, as amended, 6 U.S.C. § 202 and 6 U.S.C. § 211. PBA is collecting and sharing such information pursuant to its proprietary authority as owner/operator of the Peace Bridge.

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<sup>6</sup> As a requirement of the DHS Sensitive Systems Policy Directive 4300A, CBP must maintain IT transactional records, which include transactional information. No license plate information will be collected/retained as part of this transaction; audit logs do not contain PII and are not searchable.

<sup>7</sup> For a detailed description of the primary and secondary inspection processes, please *see* DHS/CBP/PIA-009 TECS System: CBP Primary and Secondary Processing (December 22, 2010), available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).



## **1.2 What Privacy Act System of Records Notice(s) (SORN(s)) apply to the information?**

Although a license plate/tag number can be linked to vehicle registration information (including PII about an owner or registrant), the PARE pilot does not collect or access any PII. The PARE pilot matches license plates with information already in CBP's ACE system. There is not a one-to-one relationship between the license plate/tag number and the driver and or the owner/registrator of a vehicle, nor is one created as part of the PARE pilot. Only transactional information (date, time, and source IP address associated with PBA scanning a license plate) is retained by CBP. Transactional information is stored in the CBP ACE back-end system processing and is not retrievable by PII. Likewise, information about the driver's entry record is not linked or linkable to the PARE transaction. Therefore, a System of Records Notice (SORN) is not required.<sup>8</sup>

## **1.3 Has a system security plan been completed for the information system(s) supporting the project?**

The Authority to Operate for ACE was granted on March 18, 2015.

## **1.4 Does a records retention schedule approved by the National Archives and Records Administration (NARA) exist?**

With some exceptions, CBP retains import information within ACE for six years.<sup>9</sup> CBP will retain the PARE pilot transactional information: date, time, and source of the transaction (PBA's IP address) for six years in the ACE audit logs, consistent with the existing ACE retention schedule.

## **1.5 If the information is covered by the Paperwork Reduction Act (PRA), provide the OMB Control number and the agency number for the collection. If there are multiple forms, include a list in an appendix.**

PARE verifies that commercial vehicle operators have paid fees and filed an eManifest prior to making entry into the United States. All forms associated with this process are fully described in the ACE PIA (Appendix B). PARE does not request new information nor does it trigger the Paperwork Reduction Act.

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<sup>8</sup> Please *see* DHS/CBP-001 Import Information System, July 26, 2016, 81 FR 48826 for more information about the specific PII that ACE uses and maintains.

<sup>9</sup> Please *see* DHS/CBP-001 Import Information System, July 26, 2016, 81 FR 48826 for more information about the specific PII that ACE uses and maintains and for how long.



## Section 2.0 Characterization of the Information

The following questions are intended to define the scope of the information requested and/or collected, as well as reasons for its collection.

### **2.1 Identify the information the project collects, uses, disseminates, or maintains.**

Only transactional information: date, time, and source of the transaction (PBA's IP address) associated with the license plate is retained by CBP. This information is stored in the back-end of system processing and is not retrievable by PII. License plate information is not retained by CBP. The collection of license plate data by PBA, the subsequent sharing of such data with CBP (pursuant to the Memorandum of Understanding (MOU) between CBP and PBA), and any other actions undertaken by PBA in the implementation of this pilot are conducted strictly pursuant to PBA's own authority as the owner/operator of the Peace Bridge.

No PII is collected, generated, or shared. A one-to-one relationship between the driver and the owner/registrator of a vehicle also cannot be made using PBA devices; information regarding the User Fee and eManifest is not shared with PBA (only a "yes/no" response will be sent back to PBA).

### **2.2 What are the sources of the information and how is the information collected for the project?**

PBA personnel will submit COV license plate data to CBP to verify that:

1. The vehicle decal or User Fee has been paid.
2. The eManifest has been uploaded.

PARE augments the current process by increasing the number of prepared COV travelers arriving at the CBP Primary inspection booths.

### **2.3 Does the project use information from commercial sources or publicly available data? If so, explain why and how this information is used.**

No. Commercial sources or publicly available data are not used for PARE.

### **2.4 Discuss how accuracy of the data is ensured.**

To ensure accuracy, CBP receives data directly from PBA about the COVs it encounters at the approach to the Peace Bridge. CBP compares this information with what is already stored in ACE and corresponds to the vehicle decal/User Fee and eManifest on file for that license plate. If an image of a license plate is received from PBA and there is no corresponding record in the CBP



systems, CBP will transmit a “no” response. CBP will not attempt to collect or create a new record for new information not already on file.

## 2.5 Privacy Impact Analysis: Related to Characterization of the Information

**Privacy Risk:** There is a risk of over-collection that CBP may retain more information than minimally necessary to alleviate traffic on the Peace Bridge.

**Mitigation:** This risk is mitigated through an MOU with PBA, in which CBP has agreed to receive only license plate information (tag number) of COVs collected by PBA. PBA, using its own equipment on PBA property in Fort Erie, Ontario, Canada, will scan the license plate of each COV entering a staging area and transmit only that information to CBP. PBA will not collect information on the driver or occupants of the vehicles, and therefore, CBP will not receive any information that may link a driver or passenger with the license plate.

Also, in order to further minimize the amount of information received, CBP will only retain transactional information as part of this program. When a license plate is scanned by PBA and forwarded to CBP for comparison against information already in ACE, CBP will only retain the date/time stamp of when the license plate information was received from PBA and the IP address of the device conducting the license plate scan. No license plate information is retained as part of the transactional information.

**Privacy Risk:** The purpose of PARE is to optimize U.S. inbound traffic flow on the Peace Bridge during the reconstruction. There is a risk of over-collection that the PBA may collect (and send to CBP) POV license plate information from a POV that inadvertently enters the COV staging area.

**Mitigation:** POVs will not be permitted in the COV staging area. However, it is possible that a POV may inadvertently enter the area. The PBA will post signage or have employees on hand to direct POVs to proceed directly across the bridge, preventing them from accessing COV staging lanes.

If a POV were to inadvertently access the COV staging area, an image of the POV license plate would be scanned and sent to CBP. However, CBP mitigates the risk of over-collection by not creating a record of the license plate beyond the time/date stamp in the audit log. Any license plate, such as a POV, not on file with DTOPS or within the ACE Portal will generate a “no” response. CBP will not create a new record for license plate information not already on file. In the rare likelihood that this were to occur, PBA personnel will direct the POV driver back into the POV travel lanes. Although transactional information including the date/time and source IP address is retained, a “no” response is not linked or linkable to the license plate of the POV, the vehicle, driver, or any other process (i.e., entry record) that occurs at the border.



## Section 3.0 Uses of the Information

The following questions require a clear description of the project's use of information.

### 3.1 Describe how and why the project uses the information.

PBA submits license plate information (tag number) to CBP for comparison with information already in CBP's ACE system. CBP will use the license plate information to verify that: 1) the vehicle operator has paid the DTOPS vehicle decal/User Fee; and 2) the vehicle operator has filed an eManifest within ACE. If these two elements are confirmed, CBP will return a "yes" response to PBA. If either one or both of these two elements are missing, CBP will return a "no" response to PBA. The "yes/no" response will allow PBA employees to triage the traffic and send those COVs with the appropriate information on file across the bridge, and redirect those COV drivers lacking such information to a PBA facility where drivers can enter the necessary information.

### 3.2 Does the project use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly? If so, state how DHS plans to use such results.

No.

### 3.3 Are there other components with assigned roles and responsibilities within the system?

No. There are no other components involved in the PARE pilot.

### 3.4 Privacy Impact Analysis: Related to the Uses of Information

There is no privacy risk to use of this information. CBP is collecting minimal, transactional information that is not linkable to an individual for the specific use of expediting traffic through a land Port of Entry.

## Section 4.0 Notice

The following questions seek information about the project's notice to the individual about the information collected, the right to consent to uses of said information, and the right to decline to provide information.

### 4.1 How does the project provide individuals notice prior to the collection of information? If notice is not provided, explain why not.

CBP is providing notice of the scope of activities for the PARE pilot through the publication of this PIA. PBA may provide notice at the border when COVs are directed to enter



specific commercial lanes on the Canadian side of the Peace Bridge prior to entering the United States. Any additional notice provide by PBA about PBA processes at the collection site is outside the scope of this PIA. The collection of license plate information by PBA and any subsequent activities undertaken by PBA for the implementation of this pilot is conducted strictly pursuant to PBA's own authority as the owner/operator of the Peace Bridge.

## **4.2 What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project?**

Vehicles used for the purpose of international trade and commerce and for transporting goods and cargo across international borders are considered to be owned, leased, and/or operated by a commercial business, company, Limited Liability Corporation (LLC), or other corporate entity and will be registered to that entity and not to an individual or the driver. Driver owned-and-operated vehicles (owner-operators) are considered small businesses that own, maintain, and drive their own commercial motor vehicles; User Fees and eManifests are considered to be registered to the small business, and not the driver. Therefore, since no information about individuals acting as non-business entities is collected, there is no option for COV drivers to consent to use, or option to decline to provide or opt-out.

## **4.3 Privacy Impact Analysis: Related to Notice**

There is no privacy risk to notice. All COV operators voluntarily approach the Port of Entry and must meet U.S. inspection and entry requirements prior to arrival. To provide notice of the process change on the Peace Bridge, the PBA will post signage directing COV operators to their staging area. PBA employees will be on site to assist and answer questions.

## **Section 5.0 Data Retention by the project**

The following questions are intended to outline how long the project retains the information after the initial collection.

### **5.1 Explain how long and for what reason the information is retained.**

With some exceptions, CBP retains import information within ACE for six years.<sup>10</sup> CBP will retain the PARE pilot transactional information: date, time, and source of the transaction (PBA's IP address) for six years in the ACE audit logs, consistent with the existing ACE retention schedule.

### **5.2 Privacy Impact Analysis: Related to Retention**

There is no privacy risk to retention. CBP will not retain license plate or other identifying information as part of the PARE pilot.

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<sup>10</sup> Please *see* DHS/CBP-001 Import Information System, July 26, 2016, 81 FR 48826 for more information about the specific PII that ACE uses and maintains and for how long.



## Section 6.0 Information Sharing

The following questions are intended to describe the scope of the project information sharing external to the Department. External sharing encompasses sharing with other federal, state and local government, and private sector entities.

### **6.1 Is information shared outside of DHS as part of the normal agency operations? If so, identify the organization(s) and how the information is accessed and how it is to be used.**

The program does not share specific information stored in CBP systems as part of this activity. All that is shared is a response (“yes/no”) to an inquiry from PBA, to identify which COVs have paid User Fees and have an eManifest on file.

### **6.2 Describe how the external sharing noted in 6.1 is compatible with the SORN noted in 1.2.**

The program does not share CBP information from CBP systems of records as part of this activity.

### **6.3 Does the project place limitations on re-dissemination?**

Yes. The MOU between DHS and PBA places limitations on further external sharing of license plate information scanned by PBA and the “yes/no” response related to the User Fee paid and eManifest information.

### **6.4 Describe how the project maintains a record of any disclosures outside of the Department.**

CBP maintains only transactional information (date/time stamp and IP address) for each inquiry and subsequent “yes/no” response. Transactional information will be registered as the only disclosure in CBP back-end systems; the “yes/no” response will not be retained.

### **6.5 Privacy Impact Analysis: Related to Information Sharing**

**Privacy Risk:** There is a risk that due to limited resources (i.e., staffing, tools) PBA may contract out for services to support its efforts of scanning license plate information, triaging the traffic in the staging lots, or receiving information provided back to PBA by CBP.

**Mitigation:** This risk is partially mitigated. Although CBP has entered into a MOU with PBA, there is no restriction that prevents PBA from procuring contractor support, or the support of a 3<sup>rd</sup> party vendor to assist in these activities. Any actions undertaken by PBA in the implementation of this pilot (including hiring of contractor support) is conducted strictly pursuant to PBA’s own authority as the owner/operator of the Peace Bridge.



## Section 7.0 Redress

The following questions seek information about processes in place for individuals to seek redress which may include access to records about themselves, ensuring the accuracy of the information collected about them, and/or filing complaints.

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

A SORN is not required for this pilot, therefore there are no procedures to allow individuals to access information about themselves related to PARE.

### **7.2 What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?**

There are no separate procedures for individual correction of license plate information scanned by PBA and submitted to CBP since the license plate information is not linked or associated with a driver or passenger in vehicles entering the PBA staging area. Information related to the license plate scanned by PBA is also not retained by CBP. Only transactional data (date/time stamp and IP address) is retained by CBP while only a “yes/no” response is returned to PBA. There is no PII collected or retrieved by CBP; therefore, there is no opportunity for redress for the PARE pilot.

Information related to ACE and the eManifest and User Fees paid shall follow the procedures outlined in the ACE PIA. Individuals who file information electronically may amend, correct, or cancel their active data, and ACE system updates reflect the changes. Individuals may also contact the CBP INFO Center, to request correction of erroneous ACE information.

### **7.3 How does the project notify individuals about the procedures for correcting their information?**

There are no separate procedures to allow individuals to correct license plate information scanned by PBA and submitted to CBP since license plate information is not linked or associated with a driver or passenger in vehicles entering the PBA staging area.

Information related to the license plate and transactional data (date/time, and IP address) is not retrieved by PII. CBP does not retain license plates scanned by PBA. Only a “yes/no” response is returned to PBA. There is no PII collected or retrieved by CBP, therefore, there is no opportunity for redress for the PARE pilot.

### **7.4 Privacy Impact Analysis: Related to Redress**

**Privacy Risk:** There is a risk that drivers entering the PBA staging area and whose license plates return a “no” response will insist that their eManifest has been properly filed and/or their



User Fees have been paid, and who may not be willing to accept the “no” response and will want to request redress to have information corrected.

**Mitigation:** This risk is partially mitigated. License plate information is not linked or associated with a driver or passengers of a vehicle. Therefore, based on the limited amount of information included in a transaction, the limited amount of time permitted to scan a license plate and receive a “yes/no” response in order to either move the traffic across the bridge or redirect a driver to the kiosk to verify his information, CBP and PBA are unable to provide a mechanism by which an individual is able to contest the response or seek redress for the “no” response.

All drivers whose license plate information returns a “no” response will be redirected to leave the travel lanes, and submit the information requested into the secured kiosks provided by PBA. Neither PBA nor CBP have a mechanism in place to offer to look up or verify information held in ACE while drivers are in the staging area or travel lanes.

If due to any break in electronic communications or interruptions to service that may prevent a license plate lookup in ACE or response from CBP to be received by PBA, all drivers will be redirected to the kiosks.

## Section 8.0 Auditing and Accountability

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

### **8.1 How does the project ensure that the information is used in accordance with stated practices in this PIA?**

For the PARE pilot, transactional information is maintained in audit logs within ACE and it includes the date/time of transaction and source IP address. CBP does not retain license plate information scanned and submitted from PBA to check if eManifest and User Fee are on file. Periodic reviews of audit logs will be the responsibility of CBP Office of Information Technology (OIT).

### **8.2 Describe what privacy training is provided to users either generally or specifically relevant to the project.**

There is no specific training provided to individuals in addition to annual privacy training required of all DHS personnel. PBA user training requirements are governed by PBA.



### **8.3 What procedures are in place to determine which users may access the information and how does the project determine who has access?**

Transactional audit logs stored in ACE are available only to those authorized OIT users/auditors responsible for the oversight of ACE. Privacy protections within ACE include strict access controls, including passwords and auditing that tracks access to electronic information. Authentication and role-based user access requirements ensure that users can access or change only information that is appropriate for their official duties. The effectiveness of authentication and security protections is verified through audits of system operation and usage. DHS employees and contractors with access may be subject to discipline and administrative action for unauthorized use or disclosure of this information.

### **8.4 How does the project review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within DHS and outside?**

For new sharing agreements and authorizations for access to any ACE information, the agency, component, or organization must obtain a written agreement or written authorization from CBP.

## **Responsible Officials**

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## **Approval Signature**

Original signed and on file at the DHS Privacy Office.

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