



Homeland
Security

REQUIREMENTS DECISION & ACTION MEMORANDUM

MEMORANDUM FOR:

(b)(6) (b)(7)(c)

Component Requirements Executive
U. S. Customs and Border Protection

FROM:

(b)(6) (b)(7)(c)

DHS Joint Requirements Council

SUBJECT:

U.S. Customs and Border Protection Biometric Entry-Exit Concept of
Operations

Validation/Endorsement: The Joint Requirements Council (JRC) Director validated and, on behalf of the JRC, I have endorsed the U.S. Customs and Border Protection (CBP) Biometric Entry-Exit Concept of Operations (CONOPS) for *Commercial Air Exit*. In general, the CONOPS meets the Joint Requirements Integration and Management System (JRIMS) standards for CBP Commercial Air-Exit domain. Recommend updating this CONOPS, or drafting individual CONOPS for Land and Sea Ports of Entry-Exit, as well as Air Entry operations.

Biometrics identity capture and matching is an enterprise capability, with numerous stakeholders across DHS. Per JRIMS, Biometrics Entry/Exit is designated as a joint/multi-use capability, and designated as DHS Deputy Secretary/Deputy's Management Action Group (DMAG)-interest.

Discussion: The DHS Secretary is required by executive order to expedite Biometrics entry-exit capability to verify the identities for all travelers, including United States citizens, upon entry to and exit from the U.S. Biographic data includes information specific to an individual traveler including name and date of birth, and is stored in that traveler's authorized travel document. Biometric data includes information captured from fingerprints, facial images, iris or other individual characteristics. Biometric data, when used with biographic data, will allow CBP to confirm a traveler's identity with greater assurance, match to previous encounters with CBP, and conduct biometric watch list checks.

The CBP Biometrics Entry-Exit CONOPS, as presently articulated, focuses on the development of biometric capture and matching capability in the Commercial Air Exit Domain. For air travel, CBP plans to use the biographic Advance Passenger Information System (APIS) manifest data and existing photographic facial images of travelers (U.S. Citizens and Non-U.S. Citizens) already in government databases to build targeted biometric galleries, and a "one-to-few" identity matching capability, described as a Traveler Verification Service (TVS), for use by stakeholders such as airlines, airports, Transportation Security Administration (TSA), and CBP. These stakeholders will acquire and deploy biometric capture devices and securely submit live biometric images for matching.

Per the CONOPS, CBP intends to use facial recognition as the primary biometric source, the DHS Office of Biometric Identity Management's (OBIM) Automated Biometric Identification System (IDENT)/Homeland Advanced Recognition Technology (HART) as the biometric data repository, and develop a new, similar enterprise identity matching capability for Biometric Entry-Exit. CBP and OBIM intend to draft an integration roadmap to evaluate the feasibility of transitioning to OBIM's facial recognition and matching service capabilities.

The CBP Biometrics Entry-Exit CONOPS also references a "Biometrics Pathways Vision", a DHS enterprise biometrics matching capability for use by the travel industry and DHS components to biometrically identify travelers and transform the overall traveler experience from initial encounter, through checkpoints, to entry/exit. Furthermore, the CONOPS envisions applying the Biometrics Entry-Exit concept to all travel modes (air, land and sea).

The CBP CONOPS acknowledges that significant collaboration, research and development is needed in the land and sea entry-exit domains, the air entry domain and the "Pathways Vision" to articulate a concept of operations and operational requirements in these domains.

Key CONOPS Considerations and Assumptions:

Executive Order 13780 states in Section 8 "The Secretary of Homeland Security shall expedite the completion and implementation of a biometric entry exit tracking system for in-scope travelers to the United States, as recommended by the National Commission on Terrorist Attacks Upon the United States.

The CBP CONOPS adequately describes the CBP system of systems and joint equities associated with *Commercial Air Exit operations*. However, the CONOPS will need to be updated, or individual CONOPS developed, to address Air Entry, as well as Land and Sea Ports of Entry. Additionally, cybersecurity is a significant concern, as biometric data is Personally Identifiable Information and adequate safeguards must be identified.

The CONOPS was developed by CBP. Most comments from components, including National Protection and Programs Directorate (NPPD), TSA, and Immigration and Customs Enforcement (ICE) were addressed during the CONOPS staffing process. As noted above, CBP and NPPD are developing an integration roadmap to ensure no duplication of effort for biometrics data and identity matching. In addition, CBP and TSA have discussed pilot programs to integrate similar efforts to leverage biometrics for air travel.

The CONOPS assumes airline industry, and other stakeholders will supply, maintain and operate equipment at the jet-way, and comply with capture device specifications in TVS. These assumptions will likely impact image quality and costs.

The CONOPS does not address the operational effectiveness of facial recognition biometric technology, including strengths, risks, or mitigations for facial recognition as compared to other biometrics capture devices, such as fingerprints or iris for identification purposes

Per JRIMS Manual, the CBP "Biometrics Pathways Vision", the use of facial recognition as the primary DHS enterprise biometric capture capability, and an additional biometrics matching capability requires cross-component collaboration and is of DMAG interest. CBP's Biometrics Entry-Exit concept will be forwarded to the Deputy Secretary, for consideration by the DMAG, to address DHS capability risks, opportunities to leverage commonality in capability, and not represent unnecessary redundancy, overlap, or fragmentation in capabilities.

Actions:

1. Request CBP update the Air-Exit CONOPS, or develop individual CONOPS, for Land and Sea Ports of Entry/Exit, as well as Air Entry operations when ready to pursue capabilities in these domains.
2. Request CBP update the CONOPS:
 - o The process to resolve exceptions at Air Exit (e.g., no confirmed facial match, watch list hit). This process will clearly impact the overall time associated with aircraft boarding and the value of the process to improving confidence in visa overstay metrics. This information is essential to understanding the personnel requirements for Air Exit.
 - o Explain the interface to and integration of the identity matching capability with CBP and DHS-enterprise systems with other subsystems, such as the enforcement and removal operations and officer notification system. This will highlight the system need, value and the intent of Executive Order 13780.
 - o Explain the risks and weaknesses of facial recognition, and as the program evolves, articulate if other biometric approaches (e.g., iris, fingerprints) may be incorporated. This will be particularly useful in the effort to integrate and manage data with NPPD.
3. Prior to Operational Requirements Document (ORD) validation, recommend CBP:
 - o Conduct a Cybersecurity Threat and Vulnerability Assessment. Due diligence to address privacy and security of the public's Personally Identifiable Information is essential.
 - o Establish appropriate requirements in the ORD to ensure the Biometric Entry-Exit network and data are protected according to the standards of DHS Sensitive System Policy Directive 4300A, NIST 800-53 Rev4, and DHS Management Directive 047-01 (Privacy Policy and Compliance). A high level of cybersecurity will ensure data and process integrity.

Attachment:

CBP Biometrics Entry-Exit Concept of Operations (June 27, 2017)
JRC Requirements Decision & Action Memorandum (April 5, 2017)

Cc:

DHS Undersecretary for Management
DHS Office of Program Accountability and Risk Management
DHS Office of Program Analysis & Evaluation
JRC Members