
Unprecedented Expansion of SAVE: DHS's Verification System DHS Notice on Modified System of Records And DHS–USCIS–SSA Data Sharing Agreement November 3, 2025

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On October 31, 2025, the U.S. Department of Homeland Security (DHS), U.S. Citizenship and Immigration Services (USCIS) published a [notice of a modified system of records](#) (SORN) under the Privacy Act of 1974.

Historically, the Systematic Alien Verification for Entitlements service (SAVE) has been used as a system to verify immigration status (including naturalized or derived/acquired U.S. citizens). However, since January 20, 2025, the Trump administration has undertaken an unprecedented effort to expand the use of SAVE, in violation of its governing statute. For example, DHS has included the addition of U.S. citizens by birth into the SAVE system.

This SORN enables a radical transformation of SAVE from a citizenship and immigration status verification system to a database with virtually unlimited uses. The possibility that this broad range of information will be shared with and used by a wide variety of agencies is extremely concerning, and will endanger data privacy of all U.S. residents, regardless of immigration or citizenship status.

Note: This explainer also includes information from an October 31, 2025 [Pro Publica Article](#) and a May 15, 2025 [DHS, USCIS and SSA Data Sharing Agreement](#).

More Details

What is a SORN?

The Privacy Act of 1974 requires all government agencies to publish notice of their systems of records in the Federal Register, known as a System of Records Notice or SORN. A system of records is a group of records under an agency's control, from which an agency retrieves information using an individual's name, an identifying number or symbol, or some other identifier assigned to an individual. A SORN provides transparency to the public about what types of

information an agency possesses, their authority to collect such information, and how this information is used.

What is SAVE?

SAVE, or the Systematic Alien Verification for Entitlements, is an online service for registered federal, state, tribal, territorial, and local government agencies to verify immigration status or U.S. citizenship status of individuals who are seeking benefits or licenses. U.S. Citizenship and Immigration Services (USCIS), an agency within the Department of Homeland Security (DHS), administers SAVE.

SAVE does not determine an individual's eligibility for a specific benefit or license; it provides information to the benefit-granting or licensing agency that queries SAVE, and that agency determines eligibility.

To use SAVE, an agency must execute a Memorandum of Agreement (MOA) with SAVE.

SAVE is *not* a database; it is a service that uses online systems to check information about an individual's immigration or citizenship status against relevant immigration databases.

How was SAVE Used *Before* January 20, 2025?

Before January 20, 2025, user agencies would submit an electronic verification request to SAVE by entering the first and last name, date of birth, benefit requested and at least one unique identifier (for example, A-Number, I-94 number...) to verify immigration status or naturalized or acquired/derived U.S. citizenship. However, SAVE could not determine whether an individual was a U.S.-born U.S. citizen, and it could only determine responses one at a time.

How has SAVE Been Used *After* January 20, 2025 and How is it Different?

Although a SORN is required to provide transparency and legal authority *before* the government uses data in a new way, the Trump Administration issued the SORN months *after* they began to use SAVE for new purposes. On May 15, 2025, DHS, USCIS, and the Social Security Administration entered into an [agreement](#) to share information to be able to verify U.S. citizenship. However, this agreement was not shared publicly until [October 31, 2025](#), nearly five months later.

According to [ProPublica](#), the Department of Justice began demanding access to state voter registration lists in summer 2025. By July 2025, twenty states signed agreements with DHS to use SAVE to vet voter rolls. As of September 2025, a USCIS official told [NPR](#) DHS officials had run more than 33 million voters through SAVE. The results of these queries only revealed a small number of individuals whose U.S. citizenship could not be verified: Texas identified 2,724 potential noncitizens, out of 18 million voters (.015%) on its rolls, and Louisiana identified 390 among 2.8 million (about .014%). *Notably, this does not mean those individuals were not U.S. citizens; it only means that SAVE could not immediately verify them.*

How Does DHS Want to Use SAVE Going Forward?

The expanded uses listed in the SORN include using SAVE to assist with law enforcement, auditing of programs like Medicaid, and enforcing sponsor deeming and liability. These expansions as well as what has been discussed above, demonstrate that DHS intends to convert SAVE from a system that states can use to verify immigration status status based on USCIS records for one person at a time, to a massive database that states can use to identify lists of potential non-U.S. citizens or unauthorized immigrants for a variety of likely impermissible purposes.

Information-sharing authorized by the SORN can occur without meaningful standards, criteria or limits on the dissemination of the data and information. Moreover, the SAVE revisions do not provide for any review or auditing of the dissemination. The vague “need to know” standard for information-sharing with other DHS components makes possible the use of information gathered through SAVE for immigration enforcement or other unknown purposes, which is contrary to statute.

Who Can Access this Information?

The federal statute under which the SAVE system was established permits information sharing for the purpose of program administration, and provides authorization for HHS to receive information for the limited purpose of enforcing child support obligations.¹ There is no similar grant of authority to DHS, USCIS, or any other federal department or agency. The absence of a similarly specific authorization for sharing information with USCIS via the SAVE program, *for use by USCIS or DHS* suggests that it is barred by the more general protections against sharing information.

¹ 42 U.S.C. § 1320b-7(a)(4)(B); see also 42 C.F.R. 435.945(c)

The statute also includes explicit privacy protections in the definition of the system.² It requires states to have adequate safeguards to ensure that any information exchanged is protected against unauthorized disclosure and made available only to the extent necessary to assist in the valid administrative needs of the program.³

Information the user agency collects, and information SAVE provides is subject to the Privacy Act, the MOA, the SORN, and other applicable laws (including 8 U.S.C. 1367). This information must be protected from unauthorized disclosure.

Only authorized users (registered agencies) should be permitted to access SAVE. Per the MOA, the use and distribution of the information should only be for official purposes on a need-to-know basis. SAVE is not accessible to the general public.

Does the SAVE Statute Allow for this Major Expansion?

No. The SAVE statute does not authorize USCIS to make the changes outlined in the SORN. 42 USC § 1320b-7(a)(5)(B) grants HHS, DOL, USDA, and the IRS the authority to determine the purposes that fall within the scope of administering the program, versus the “other purposes” for which unauthorized disclosure must be protected (e.g. Secretary of Labor for unemployment compensation). The section below it, 42 U.S.C. § 1320b-7(d) does not grant DHS or USCIS any similar authority. Despite these statutory prohibitions, the DHS-USCIS-SSA data sharing agreement does not bar DHS from using the SSA data for other purposes such as immigration enforcement.

How Does the Expanded SAVE Verification Process Work?

Previously, an agency would submit an electronic verification request to SAVE by entering a unique identifier and other required data elements on the applicant (described below), selecting the benefit(s) an applicant is seeking, and selecting any additional information needed. Within seconds, SAVE would provide a response based on USCIS data, regarding the applicant’s immigration status, allowing the querying agency to determine benefit eligibility. USCIS claims that more than 80% of verification requests were completed at this step. There are additional verification steps for individuals who cannot be verified with this information alone.

The new process is different in a number of ways:

² See 42 U.S.C. § 1320b-7(d)(3) (“...the State shall utilize the individual’s alien file or alien admission number to verify with the Immigration and Naturalization Service the individual’s immigration status through an automated or other system (designated by the Service for use with States) that— (A) utilizes the individual’s name, file number, admission number, or other means permitting efficient verification, and (B) protects the individual’s privacy to the maximum degree possible.”).

³ See 42 U.S.C. § 1320b-7(a)(5).

- An agency can submit a *list* of individuals to verify and not just one at a time.
- An agency can provide an SSN or partial SSN, rather than a unique identifier.
- SAVE can send the data to SSA, which provides an indication of U.S. citizenship or immigration status and an Alien Number (A-Number).
- SAVE can use the A-Number to access the necessary records within SAVE.
- SAVE creates and stores a case file with all this information.
- This results in DHS having a record of individuals that includes both individuals who have sought immigration benefits from USCIS and individuals who have not had any encounters with USCIS, such as U.S.-born citizens who are in SSA's system(s).

What Data Elements Is the Expanded SAVE Using to Verify Status?

Historically, for an agency to obtain verification of an individual's status, they were required to provide the following information to SAVE:

- The individual's first name, last name, date of birth;
- The public benefit(s) the individual requested; AND
- At least one of the following unique identifiers:
 - Alien Number (A-Number or USCIS Number)
 - Foreign Passport Number
 - Form I-94, Arrival/Departure Record Number
 - Student and Exchange Visitor Information System (SEVIS) ID number
 - Naturalization/Citizenship Certificate Number
 - Visa Number
 - I-797 Receipt Number
 - Card Number (printed on the back of Form I-551 or Form I-766)

The SORN indicates that USCIS will add to the categories of records in the system to collect additional information:

- Social Security Number (both full and the last four digits)
- U.S. passport number
- Driver's license number
- Information from the Social Security Administration

Please contact Sarah Krieger at Krieger@nilc.org or Sonya Schwartz sonya@pifcoalition.org with questions.