



Privacy Impact Assessment
for the

Correspondence Handling and Management Planning System

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Contact Point

**Donald Hawkins
Privacy Officer**

**United States Citizenship and Immigration Services
Department of Homeland Security
202-272-1400**

Reviewing Official

**Hugo Teufel III
Chief Privacy Officer
Department of Homeland Security
(703) 235-0780**



Abstract

The Department of Homeland Security (DHS), Citizenship and Immigration Service (USCIS), Texas Service Center (TSC) has developed the Correspondence Handling and Management Planning System (CHAMPS). The CHAMPS system is designed to facilitate workflow management, production evaluation, and time and attendance functions. USCIS has conducted this Privacy Impact Assessment because CHAMPS collects and uses personally identifiable information (PII).

Overview

CHAMPS is an application used by personnel at the USCIS Texas Service Center which provides a centralized repository of data for case review, case management, production evaluation, time and attendance tracking, and reporting. CHAMPS is comprised of two main components: case review and management and time and attendance. CHAMPS also produces predefined and ad hoc reports.

Case Review and Management

The case review and management function of CHAMPS provides a streamlined and efficient workflow by identifying unworkable immigration petitions and applications at the Texas Service Center. An unworkable case is an incomplete petition or application. In addition, adjudicators use CHAMPS to identify and link all petitions and applications filed by an applicant to family members who are also filing applications. This assists adjudicators in more efficiently determining the status of all of the petitions or applications filed by a family.

To link applicants with their family members, CHAMPS uses a Principle Derivative System. Through this subsystem of CHAMPS, USCIS maintains a table (called a Principle Derivative Link) which links an applicant (the principle) to the applicant's family (the derivatives) by utilizing the A-number of the principle applicant. In CHAMPS, the principle's A-number is keyed into a field in the family member's record. This enables the Texas Service Center to readily identify family record sets for processing at the same time. CHAMPS maintains the applicant's and his or her family member's applications until all applications are processed. Once processed, the records are deleted from CHAMPS.

An added benefit from linking family members is the cross country chargeability for some applicants and their spouses. Cross country chargeability occurs where a married couple from different countries of origin has applied under the husband's A-number to obtain a visa, and the processing time for a visa from his country of origin is longer than that of his wife's country of origin. To avoid delay, USCIS may use the wife's country of origin to obtain the visa more speedily.

A typical transaction for this process begins when a USCIS manager runs a "pick list" of ready to work cases. A pick list is a list compiled of cases that are "picked" or chosen based on type of application. The manager then locates the A-File through the National File Tracking System (NFTS) and requests the file through the Central Index System. The manager reviews this pick list and then assigns outstanding cases to adjudicators. Adjudicators review the A-Files and validate the information in Computer Linked Application Information Management System (CLAIMS 3), Scheduling and Notification of Applicants for Processing (SNAP) system, National File Tracking System (NFTS), Interagency Border Inspection System (IBIS), FD258 (FBI Fingerprint and name check data), and United States State Department Visa Bulletin data. The data from these systems is extracted for temporary use (data extracts are purged nightly) by the adjudicator in determining application discrepancies and missing data.



If the adjudicator discovers discrepancies or missing data, the adjudicator sends a request for evidence to the applicant or representative. The applicant has 90 days to respond. Once a response is received, the adjudicator finalizes the case by updating data in CLAIMS 3 and determining whether to grant or deny the benefit; the adjudicator does not update any information systems other than CLAIMS 3. The following day, CHAMPS will capture the result using a data sweep of CLAIMS 3. The other systems are updated by their own processes, and any corrections needed have to be done through their own redress processes.

Time and Attendance

CHAMPS is also used to track USCIS Texas Service Center employees' time and attendance information. CHAMPS tracks hours worked and hours worked as they relate to specific job functions. CHAMPS tracks hours worked as they are linked to predefined functions known as G22 line items. The G22 line number identifies the function performed. Every immigration form and employment time and attendance data type is associated with a G22 line item.

CHAMPS also serves as an adjudicator's evaluation tool by linking the adjudicator production data (number of approvals, denials, requests for evidence, intent to deny forms, case "transfer in" requests and case "transfer out" requests) obtained from CLAIMS 3 to the time and attendance information entered into CHAMPS by the adjudicator. A portion of an adjudicator's evaluation is production. By linking the production of the adjudicator to actual CLAIMS 3 activity, CHAMPS provides an accurate count of how many and what types of immigration forms each adjudicator processes.

The USCIS employee enters his or her time and attendance information into the system using their CLAIMS 3 user identification (ID). A manager may then compare CLAIMS 3 activity for an employee to the data entered into CHAMPS.

The information collected for time and attendance is employee name (first, middle, and last), CLAIMS 3 user ID, hours worked, functions performed, overtime, leave time, and meetings attended.

Reporting

CHAMPS produces pre-determined reports for recurring requests, and provides functionality to produce *ad hoc* reports. These reports are used to identify cases in various stages of the adjudication process, produce reports for USCIS Headquarters, as well as reporting within the Texas Service Center. Examples of pre-determined reports include unworkable cases due to missing fingerprints, missing name checks, and cases exempt from fingerprints because under 14 years of age cases. Examples of *ad hoc* reports include the number of I-485 employment based applications for a given country or how many family members have filed for a certain type of benefit.



Section 1.0 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 as part of the program, system, rule, or technology being developed.

1.1 What information is collected, used, disseminated, or maintained in the system?

CHAMPS currently collects and uses the following information to process N-400, N-600, and N-565 applications:

Name: Applicant first and last name, attorney names, attorney firm names, names of family members and relationship to applicant.

Addresses: Addresses of the applicant and attorney

Date of Birth: Date of birth for applicants

Immigration Data: Country of birth, country of citizenship, country of residence, and A-Number. Also, in the history file, all action codes are maintained, which would include approvals and denials of immigration benefits.

Case management records: Request for evidence (if required) and request for evidence response, National File Tracking System (NFTS) file location result, and receipt number

Background Information: Fingerprint results and date; the name check result and date

The information collected for time and attendance is employee name (first, middle, and last), CLAIMS user ID, hours worked, functions performed, overtime, leave time, and meetings attended.

1.2 What are the sources of the information in the system?

For case management purposes, data is extracted from:

- CLAIMS 3 (a history of cases processed the day before and a list of pending cases),
- FD258 (fingerprint results either IDENT: positive for possible criminal activity or NONIDENT: no history of criminal activity),
- TECS/IBIS¹ (name check for aliases²), and
- NFTS (to determine the location of a file).

¹ See Treasury Enforcement Communications System (TECS) SORN at 66 FR 52984.

² Adjudicators must perform an IBIS check with the IBIS system; if a “hit” is obtained from an alias name, it is flagged and the Fraud Detection Unit, along with ICE, are informed for further investigation. This information is not stored in CHAMPS; only the IBIS code is shown in the history file.



For the State Department Visa Bulletin, the database administrator modifies the visa dates in CHAMPS based on the dates listed on the public visa bulletin. The United States Department of State, through the Bureau of Consular Affairs, publishes the monthly "Visa Bulletin." The Visa Bulletin lists the availability of "immigrant numbers" during the month of publication, and is intended as a guide for consular officials, attorneys, and others who would like to know if visas are immediately available for individuals in particular categories.

For time and attendance, USCIS employees enter their own time and attendance data into the system.

1.3 Why is the information being collected, used, disseminated, or maintained?

The information is collected, used, and maintained to provide a more efficient method of workflow and to create a snapshot of production levels within the Texas Service Center. The CHAMPS system provides "real-time" time and attendance data for management as well as overtime statistics for individuals and the Texas Service Center. The CHAMPS system also identifies workable and unworkable immigration cases and provides the location of those cases in the workflow process.

1.4 How is the information collected?

The data is collected from government sources (databases such as FD258, NFTS, IBIS, CLAIMS 3) and from the U.S. Department of State's WEB site (www.state.gov) via electronic transmission. USCIS employees manually enter their own data for time and attendance.

1.5 How will the information be checked for accuracy?

For case management purposes, adjudicators compare the data from CLAIMS 3, FD258, and TECS/IBIS to the A- file and the application. If discrepancies are found, the CLAIMS 3, FD258 and/or IBIS data are updated with the correct information. All sources are corrected at the originating source, which is why CLAIMS C3 is updated by the adjudicator. The other systems are updated by their own processes, and any corrections needed have to be done through their redress processes. On the next extract from those systems, CHAMPS will reflect the new values (data). CLAIMS 3 data is extracted daily, and FD258 and IBIS data is extracted twice a week. The adjudicator will not make a determination to grant or deny a benefit until the application is complete. During a case review, if an adjudicator discovers discrepancies in the information, an intent to deny the benefit form is produced and sent to the applicant who has 30 days to respond. If an application contains inaccurate data, an applicant may respond by registered mail by rebutting the intent to deny the benefit or responding to the request for additional evidence.

For time and attendance purposes, the USCIS employee enters his or her own information into the system and is required to report his or her time and attendance accurately. One of the purposes of the CHAMPS' time and attendance system is to verify accuracy by comparing data entered into CHAMPS to production information in CLAIMS 3. Through this process, the CLAIMS 3 user ID and CHAMPS user ID are linked. All actions performed by adjudicators in CLAIMS 3 have a date and time stamp. Adjudicators enter the numbers of hours worked on each case/form typed into CHAMPS. This information should correspond with the dated and time stamped actions listed in CLAIMS 3.



1.6 What specific legal authorities, arrangements, and/or agreements defined the collection of information?

The legal authority for CHAMPS is derived from 8 United States Code (U.S.C.) Section 1101 *et seq.* More specifically, 8 U.S.C. Section 1103 charges the Secretary of Department of Homeland Security (DHS) with the duty of administering and enforcing all laws relating to the immigration and naturalization of aliens.

1.7 Privacy Impact Analysis: Given the amount and type of data collected, discuss the privacy risks identified and how they were mitigated.

Privacy Risk: CHAMPS presents a risk of data inaccuracy.

Mitigation: The accuracy of this data is limited by the accuracy of the data in the source systems, but the accuracy of the data in the source systems is improved as input and others errors are discovered during CHAMPS processes. Adjudicators compare the data from CLAIMS 3, FD258, and IBIS to the hard copy file. If discrepancies are found, the CLAIMS 3, FD258, and/or IBIS data are updated with the correct information. Once the data is modified in the originating system, the next extract of data taken from each system by CHAMPS corrects the data in CHAMPS. If the State Department posted inaccurate information in the visa bulletin and corrects that information, CHAMPS will be updated with that new information with each monthly State Department release of data.

During a case review, if an adjudicator discovers derogatory information, an intent to deny the benefit form is produced and sent to the applicant who has 30 days to respond. If an application contains inaccurate data, an applicant may rebut the intent to deny the benefit or respond to the request for additional evidence sent out by the adjudicator assigned the case.

Section 2.0 Uses of the Information

The following questions are intended to delineate clearly the use of information and the accuracy of the data being used.

2.1 Describe all the uses of information.

CHAMPS utilizes PII obtained from the source systems to process immigration petitions and applications for benefits. The PII is used to identify and link multiple petitions and applications to one person and family members of that person and determine the status of those cases. The benefit of this linkage is processing of all applications and petition by this applicant in an orderly fashion which will result in a more beneficial outcome to the applicant as well as USCIS. Some petitions/ applications are dependent upon others and must be adjudicated in a certain order. Others simply are no longer needed if a previous benefit was granted; therefore, a denial can be generated to remove the case from the pending table.

PII is also used in identifying individual cases with deficiencies that are being held up as unworkable until those deficiencies are corrected. CHAMPS also provides management with pick lists for



work and reporting purposes.

CHAMPS also serves as time and attendance tool and an adjudicator evaluation (production) system by linking the adjudicator's production data (number of approvals, denials, requests for evidence, intent to deny forms, transfer in requests, and transfer out requests) obtained from CLAIMS 3 to the time and attendance information entered by the adjudicator into CHAMPS.

2.2 What types of tools are used to analyze data and what type of data may be produced?

Microsoft SQL Server 2005 Enterprise Edition, including the Business Intelligence Development Studio are utilized to manage, analyze and produce reports for specific case actions. This allows the managers to identify unworkable cases, which are cases not ready for immediate adjudication due to missing data. This streamlines the adjudication process and identifies cases that have deficiencies allowing for a work flow process to be created to alleviate the deficiencies.

CHAMPS produces pre-determined reports for recurring requests from USCIS Headquarters, and provides functionality to produce *ad hoc* reports. These reports are used to identify cases in various stages of the adjudication process, produce reports for USCIS Headquarters, as well as reporting within the TSC.

2.3 If the system uses commercial or publicly available data please explain why and how it is used.

The only publicly available data used by CHAMPS is derived from the U.S. Department of State's Visa bulletin available at www.state.gov. This bulletin is updated by the U.S. Department of State on a monthly basis either moving visa availability dates forward or backward to stay within the congressionally-determined availability dates: Congress determines how many visas will be available for each country and the State Department administers the visa program. The dates from the bulletin are put into an update script and records are updated to match the bulletin. USCIS uses the State Department VISA data to approve certain I485 employment-based applications. Each I485 employment application has a priority date. That priority date must be less than the VISA bulletin availability date to obtain approval. Otherwise, the case lingers until the VISA bulletin availability date changes to exceed the priority date I485 employment-based application.

CHAMPS does not collect information from data-brokers or other commercial information services.

2.4 Privacy Impact Analysis: Describe any types of controls that may be in place to ensure that information is handled in accordance with the above described uses.

Risk: There is a risk that family members and non-family members will be improperly linked.

Mitigation: The risk of improper linkage is mitigated by the Principle Derivative CHAMPS subsystem, as detailed above. By utilizing the principle's A-number to link the applications/petitions during the data entry process, error rates have been reduced drastically, thereby, expediting the adjudication process.



Further, all users are provided extensive training in handling PII and sign Rules of Behavior and end user agreements for CHAMPS. Any output from the CHAMPS system comes with this warning:

WARNING: This document is FOR OFFICIAL USE ONLY (FOUO). It is to be controlled, stored, handled, transmitted, distributed, and disposed of in accordance with DHS policy relating to FOUO information. This information shall not be distributed beyond the original addressees without prior authorization of the originator.

As part of the production tool, management tracks and reviews all user action in CHAMPS. This ensures that actions taken on the CHAMPS system are reviewed for efficient case management and for possible misuse or inappropriate access to data.

Section 3.0 Retention

The following questions are intended to outline how long information will be retained after the initial collection.

3.1 How long is information retained?

USCIS is drafting the retention schedule to be submitted to National Archives and Records Administration (NARA). The proposed schedule states that the data in the CHAMPS system is retained until the case has reached final adjudication. This can result in retention of data for up to two years. This data includes the administrative files used to assign cases to adjudicators, and time and attendance data. Source system extracts are purged nightly, and the source systems retain the original records per the Federal Records Act.

However, because the majority of the data in CHAMPS originates from CLAIMS 3; until the NARA retention schedule is approved, CHAMPS follows the CLAIMS 3 retention schedule. Information located in CLAIMS 3 is maintained and disposed of in accordance with the criteria approved by NARA. Information in the master file is destroyed 15 years after the last completed action with respect to the application. System documentation (e.g., manuals) is destroyed when the system is superseded, obsolete, or no longer needed for agency business. Electronic records extracted from immigration benefits applications other than naturalization, asylum, or refugee status completed by applicants is destroyed after the data is transferred to the electronic master file and verified. Daily reports generated by associated information technology systems are maintained for 15 years by the service center that generated the reports and then destroyed.

3.2 Has the retention schedule been approved by the component records officer and the National Archives and Records Administration (NARA)?

NARA has not approved the retention schedule for CHAMPS. NARA approved the retention schedule for CLAIMS 3 on March 25, 2007.



3.3 Privacy Impact Analysis: Please discuss the risks associated with the length of time data is retained and how those risks are mitigated.

Privacy Risk: Keeping data in CHAMPS longer than necessary would violate the Fair Information Practice that requires the retention of the minimum amount of information necessary to perform relevant governmental functions.

Mitigation: Although there is always risk inherent in retaining data for any length of time, the CHAMPS data retention periods (which will be identified in the NARA schedules once approved) are consistent with the concept of retaining data only for as long as necessary to support the agency's mission. The schedules proposed and approved by NARA for CLAIMS 3 comply with the requirements of the Federal Records Act and the stated purpose and mission of the systems.

The time periods in the NARA schedules for CLAIMS 3 were carefully negotiated between USCIS and NARA to ensure that data is retained for the minimum time needed to process the application and make the information available for other USCIS benefits that might be sought by an applicant.

Section 4.0 Internal Sharing and Disclosure

The following questions are intended to define the scope of sharing within the Department of Homeland Security.

4.1 With which internal organization(s) is the information shared, what information is shared and for what purpose?

PII stored in CHAMPS is only shared within the USCIS Texas Service Center. Case management and time and attendance reports (based on the raw data) are also shared with USCIS Headquarters. With those two exceptions, CHAMPS data is not shared with other DHS or USCIS components. The number count reports produced for headquarters include statistical data (numbers of cases by application type) only and contain no PII. No information is sent from CHAMPS to the originating systems listed above

Only adjudicators have access to their personal time and attendance and performance data. USCIS Managers' access is restricted to the division under their supervision (specific form types), and the data is kept compartmentalized.

4.2 How is the information transmitted or disclosed?

The number count reports are sent to headquarters via PDF.

4.3 Privacy Impact Analysis: Considering the extent of internal information sharing, discuss the privacy risks associated with the sharing and how they were mitigated.

Privacy Risk: CHAMPS presents a risk of sharing data with persons who do not need it to perform their official duties.



Mitigation: The extent of internal sharing is only between supervisors, managers and Director of the Texas Service Center. Only Texas Service Center managers have access to the pick lists and employee performance modules related to their own workforce. Privacy risks are mitigated by CHAMPS internal security controls for access. All users are provided extensive training in handling privacy data and sign Rules of Behavior and end user agreement for CHAMPS. Any output from the CHAMPS system comes with this warning:

WARNING: This document is FOR OFFICIAL USE ONLY (FOUO). It is to be controlled, stored, handled, transmitted, distributed, and disposed of in accordance with DHS policy relating to FOUO information. This information shall not be distributed beyond the original addressees without prior authorization of the originator.

Section 5.0 External Sharing and Disclosure

The following questions are intended to define the content, scope, and authority for information sharing external to DHS which includes Federal, state and local government, and the private sector.

5.1 With which external organization(s) is the information shared, what information is shared, and for what purpose?

CHAMPS data is not shared outside of USCIS. Any information sharing with other entities is done through CLAIMS 3. For a full discussion of external CLAIMS 3 information sharing please see the Privacy Impact Assessment for USCIS Benefits Processing of Applicants other than Petitions for Naturalization, Refugee Status, and Asylum located at: http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_cis_claims3.pdf.

5.2 Is the sharing of personally identifiable information outside the Department compatible with the original collection? If so, is it covered by an appropriate routine use in a SORN? If so, please describe. If not, please describe under what legal mechanism the program or system is allowed to share the personally identifiable information outside of DHS.

CHAMPS data is not shared outside of USCIS. Any information sharing with other entities is done through CLAIMS 3. The CHAMPS system is covered by the Benefits Information Systems SORN located at 73 FR 56596. Individuals are provided notice via the Benefits Information Systems SORN.

5.3 How is the information shared outside the Department and what security measures safeguard its transmission?

CHAMPS data is not shared outside of USCIS. Any information sharing with other entities is done through CLAIMS 3. Please see the Privacy Impact Assessment for USCIS Benefits Processing of Applicants other than Petitions for Naturalization, Refugee Status, and Asylum located at: http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_cis_claims3.pdf.



5.4 Privacy Impact Analysis: Given the external sharing, explain the privacy risks identified and describe how they were mitigated.

The data used by CHAMPS is only shared through CLAIMS 3. Please see the Privacy Impact Assessment for USCIS Benefits Processing of Applicants other than Petitions for Naturalization, Refugee Status, and Asylum located at: http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_cis_claims3.pdf.

Section 6.0 Notice

The following questions are directed at notice to the individual of the scope of information collected, the right to consent to uses of said information, and the right to decline to provide information.

6.1 Was notice provided to the individual prior to collection of information?

Individuals who apply for USCIS benefits are presented with a Privacy Act Statement as required by Section (e)(3)³ of the Privacy Act and sign a release authorization on the benefit application/petition. The Privacy Act Statement details the authority to collect the information requested and uses to which USCIS will put information the applicant provides on immigration forms and in support of an application. The forms also contain a provision by which an applicant authorizes USCIS to release any information received from the applicant as needed to determine eligibility for benefits. The CHAMPS system is covered by the Benefits Information Systems SORN located at: <http://edocket.access.gpo.gov/2008/E8-22802.htm>. Individuals are provided notice via the Benefits Information Systems SORN.

6.2 Do individuals have the opportunity and/or right to decline to provide information?

Providing information on immigration forms is a voluntary act on the part of the individual seeking a benefit. The individual, however, must submit a complete application in order to receive USCIS benefits. Applicants may decline to provide the required information; however, it may result in the denial of the applicant's benefit. This condition is clearly stated on each USCIS form.

The CHAMPS system is not the original point of collection for any data. Individuals must exercise their right to decline to provide information with the source system from which CHAMPS obtained the data.

6.3 Do individuals have the right to consent to particular uses of the information? If so, how does the individual exercise the right?

USCIS benefit applications require that applicants provide certain biographic and biometric information that may include submission of fingerprints, photographs, and signatures in addition to other

³ The USCIS Privacy Policy can be found at: <http://www.uscis.gov> and on the instructions that accompany each form.



information requested in an application. This information is critical in making an informed adjudication decision to grant or deny a USCIS benefit. The failure to submit such information prohibits USCIS from processing and properly adjudicating the application/petition and thus precludes the applicant from receiving the benefit. Therefore, during the application process, individuals consent to the use of the information submitted for adjudication purposes. Specifically, all USCIS immigration forms include a Privacy Act Statement and require the applicant's signature authorizing "the release of any information from my records that USCIS needs to determine eligibility for the benefit." USCIS forms also contain a statement notifying applicants that their information may be shared with other federal agencies as well. This information is also conveyed in the SORN for this system and in the Privacy Act Statement on the application itself. Applicants are provided an opportunity to review how their information will be used and shared. Individuals grant consent to the collection and use of the information when they sign the application.

6.4 Privacy Impact Analysis: Describe how notice is provided to individuals, and how the risks associated with individuals being unaware of the collection are mitigated.

Applicants for USCIS benefits are made aware that the information they are providing is being collected to determine whether they are eligible for immigration benefits. Each immigration form contains a provision by which an applicant authorizes USCIS to release any information from the application as needed to determine eligibility for benefits. Applicants are also advised that the information provided will be shared with other Federal, state, local and foreign law enforcement and regulatory agencies during the course of the investigation. The Benefits Information System SORN provides additional notice to individuals by specifying the routine external uses to which the information will be put. In the USCIS website Privacy Notice,¹⁰ individuals are also notified that electronically submitted information is maintained and destroyed according to the principles of the Federal Records Act, NARA regulations and records schedules, and in some cases may be covered by the Privacy Act and subject to disclosure under the Freedom of Information Act (FOIA). OMB approved all Privacy Act Statements used when collecting data.

Section 7.0 Access, Redress and Correction

The following questions are directed at an individual's ability to ensure the accuracy of the information collected about them.

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

USCIS treats all requests for amendment of information in a system of records as Privacy Act amendment requests. Any individual seeking to access information maintained in CHAMPS should direct his or her request to the USCIS FOIA / Privacy Act (PA) Officer at USCIS FOIA/PA, 70 Kimball Avenue, South Burlington, Vermont 05403-6813 (Human resources and procurement records) or USCIS National Records Center (NRC), P. O. Box 648010, Lee's Summit, MO 64064-8010 (all other USCIS records). The process for requesting records can be found at 6 Code of Federal Regulations, Section 5.21. Requests for



records amendments may also be submitted to the service center where the application was originally submitted. The request should state clearly the information that is being contested, the reasons for contesting it, and the proposed amendment to the information. If USCIS intends to use information that is not contained in the application or supporting documentation (e.g., criminal history received from law enforcement), it will provide formal notice to the applicant and provide them an opportunity to refute the information prior to rendering a final decision regarding the application. This provides yet another mechanism for erroneous information to be corrected.

Requests for access to records in this system must be in writing. Such requests may be submitted by mail or in person. If a request for access is made by mail, the envelope and letter must be clearly marked "Privacy Access Request" to ensure proper and expeditious processing. The requester should provide his or her full name, date and place of birth, and verification of identity (full name, current address, and date and place of birth) in accordance with DHS regulations governing Privacy Act requests (found at 6 Code of Federal Regulations, Section 5.21), and any other identifying information that may be of assistance in locating the record.

If there is a deficiency in information in an application, an applicant may respond to a request for additional evidence or rebut an intent to deny. If data corrections are made to the original source system, the next data extract from the source system will update CHAMPS.

7.2 What are the procedures for correcting inaccurate or erroneous information?

Requests to contest or amend information contained in CHAMPS should be submitted as discussed in Section 7.1. The requestor should clearly and concisely state the information being contested, the reason for contesting or amending it, and the proposed amendment. The requestor should also clearly mark the envelope, "Privacy Act Amendment Request." The record must be identified in the same manner as described for making a request for access.

During a case review, if an adjudicator discovers derogatory information, an intent to deny the benefit form is produced and sent to the applicant. The applicant has 30 days to respond to the intent to deny with corrected information.

7.3 How are individuals notified of the procedures for correcting their information?

The Privacy Act System of Records Notice (SORN) for the *USCIS Benefits Processing of Applicants other than Petitions for Naturalization, Refugee Status, and Asylum* provides individuals with guidance regarding the procedures for correcting information. This PIA also provides similar notice. Privacy Act Statements, including notice of an individual's right to correct information, are also contained in immigration forms published by USCIS.

7.4 If no formal redress is provided, what alternatives are available to the individual?

Applicants and employees are provided opportunities for redress as discussed above.



7.5 Privacy Impact Analysis: Please discuss the privacy risks associated with the redress available to individuals and how those risks are mitigated.

Privacy Risk: The main risk with respect to redress is that the right may be limited by Privacy Act exemptions or limited avenues for seeking redress.

Mitigation: The redress and access measures offered by USCIS are appropriate given the purpose of the system. Individuals are given numerous opportunities during and after the completion of the applications process to correct information they have provided and to respond to information received from other sources. USCIS does not claim any Privacy Act access and amendment exemptions for this system so individuals may avail themselves to redress and appeals as stated in the DHS Privacy Act regulations (found at 6 Code of Federal Regulations, Section 5.21).

For the time and attendance functions, USCIS employees enter their own information into the database. This ensures accurate information as well as employee involvement in their record and timekeeping. Procedural mechanisms for access and correction are included within the application.

Section 8.0 Technical Access and Security

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

8.1 What procedures are in place to determine which users may access the system and are they documented?

The CHAMPS system utilizes a tier-less access system. This means that users are given access only by authority of management and the CHAMPS team. Texas Service Center management are only given access to their division's information and the Director and Deputy Director have access to view all records by virtue of their positions and the need to provide guidance to their management personnel.

8.2 Will Department contractors have access to the system?

Department contractors have access to CHAMPS, but access is limited to data entry and locating files via NFTS (the USCIS file tracking system).

8.3 Describe what privacy training is provided to users either generally or specifically relevant to the program or system?

USCIS provides training to all CHAMPS users. This training addresses appropriate Privacy Act obligations including SORNs and Privacy Act statements. In addition, Computer Security Awareness training is provided on an annual basis and CHAMPS users are frequently given a refresher computer based tutorial.



8.4 Has Certification & Accreditation been completed for the system or systems supporting the program?

Certification and Accreditation (C&A) has been completed for the systems from which CHAMPS collects the data. USCIS is currently conducting C &A for CHAMPS. Completion of C&A is expected by January 2009. CHAMPS is operating under an interim agreement between the Director of the Texas Service Center and the USCIS Chief Information Officer.

8.5 What auditing measures and technical safeguards are in place to prevent misuse of data?

The CHAMPS system has internal audits and domain security audits.. USCIS conducts audit tracking for all data entered into CLAIMS 3 for time and attendance. In addition, TSC managers run monthly database administration audits.

8.6 Privacy Impact Analysis: Given the sensitivity and scope of the information collected, as well as any information sharing conducted on the system, what privacy risks were identified and how do the security controls mitigate them?

Privacy Risk: Given the scope of the personal information in CHAMPS, the security of the information on the system is of critical importance. Due to the sensitive nature of this information, there are inherent security risks (e.g., unauthorized access, use and transmission/sharing) that require mitigation.

Mitigation: To mitigate these risks, a number of business and systems rules have been implemented. Access and security controls have been established to identify and mitigate privacy risks associated with authorized and unauthorized users, namely misuse and inappropriate dissemination of data. Access to the database is given only to users that need it to perform their official duties. All authorized users must authenticate using a user ID and password. Role-based user accounts are used to minimize the number of persons who have access to the system. Audit trails are kept in order to track and identify any unauthorized changes to information in the system. CHAMPS has a comprehensive audit trail tracking and maintenance function that stores information every action taken.

Section 9.0 Technology

The following questions are directed at critically analyzing the selection process for any technologies utilized by the system, including system hardware, RFID, biometrics and other technology.

9.1 What type of project is the program or system?

The CHAMPS system is a decision support system.



9.2 What stage of development is the system in and what project development lifecycle was used?

CHAMPS is in the operations and maintenance phase of the DHS Life Cycle.

9.3 Does the project employ technology which may raise privacy concerns? If so please discuss their implementation.

CHAMPS only contains information related to the application and adjudication of benefits and time and attendance data. The systems do not have the technology or the ability to monitor the activities of individuals or groups beyond that required to adjudicate applications and petitions.

Approval Signature

Original signed and on file with the DHS Privacy Office.

Hugo Teufel III
Chief Privacy Officer
Department of Homeland Security