



**Privacy Impact Assessment Update
for the**

**Correspondence Handling and
Management Planning System
(CHAMPS)**

DHS/USCIS/PIA-012(a)

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Abstract

The Department of Homeland Security (DHS) U.S. Citizenship and Immigration Services (USCIS) operates the Correspondence Handling and Management Planning System (CHAMPS) at the Texas Service Center (TSC), which is designed to facilitate workflow management, production evaluation, and time and attendance functions. USCIS is updating this Privacy Impact Assessment (PIA), originally published on January 13, 2009,¹ to reflect the addition of TSC employee telework information and emergency contact information to the employee profile of the Time and Attendance and Production Evaluation module of CHAMPS. USCIS is publishing this update because these modifications affect the collection, use, and storage of personally identifiable information (PII).

Overview

USCIS oversees lawful immigration to the United States and is responsible for processing petitions, applications, and other requests for immigration benefits. The CHAMPS application is used by personnel at the USCIS TSC to provide a centralized repository of data for case review, case management, production evaluation, time and attendance tracking, and reporting. The CHAMPS application was initially developed to assist with workload tracking and managerial reporting. The system has evolved into a robust web-based application that provides statistical data regarding employee productivity in addition to categorizing and identifying case workloads from the Computer Linked Application Information Management System 3 (CLAIMS 3).²

CHAMPS currently contains the following three modules: 1) Case Review and Management; 2) Time and Attendance and Production Evaluation; and 3) Reporting.

Case Review and Management

CHAMPS is designed to perform the following case management functions: identify cases that may be delayed because of deficient information or documentation; identify and link multiple petitions and applications to one person and family members of that person; determine the status of those cases; and produce regular and *ad hoc* reports for management.

The CHAMPS system uses data from the following source systems: Computer Linked Application Information Management System (CLAIMS 3); FD-258 Tracking System -

¹ See DHS/USCIS/PIA-012 Correspondence Handling and Management Planning System (CHAMPS), available at www.dhs.gov/privacy.

² See DHS/USCIS/PIA-016(a) Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems, available at www.dhs.gov/privacy.



Mainframe (FD-258 MF);³ National File Tracking System (NFTS);⁴ and the U.S. State Department's Visa Bulletin data.⁵

Time and Attendance and Production Evaluation

CHAMPS is used to track USCIS TSC employees' time and attendance information. CHAMPS also serves as an evaluation tool by linking the adjudicator production data. For instance, the system links adjudicator production data extracted from CLAIMS 3 (number of approvals, denials, requests for evidence, intent to deny forms, case "transfer in" requests, and case "transfer out" requests) to the time and attendance information (and productivity data for forms not handled by CLAIMS 3) entered into CHAMPS by the adjudicator. Linking the productivity of the adjudicator to actual CLAIMS 3 activity allows CHAMPS to provide an accurate count of how many and what types of immigration forms each adjudicator processes on a daily basis.

USCIS is updating the Time and Attendance and Production Evaluation module of CHAMPS to collect TSC employee telework and emergency contact information. Each employee has a user profile that allows the employee to enter data related to telework reports (i.e., home address and phone numbers) and up to three emergency contacts into his or her user profile. Employees also schedule their telework days for each upcoming two-week pay period.

Reporting

CHAMPS produces both routine reports for recurring requests, and *ad hoc* reports for non-routine requests. The routine reports are used to identify cases in various stages of adjudication, which are produced for USCIS Texas Service Center (TSC) and USCIS Headquarters offices. Examples of routine reporting includes unworkable cases due to missing fingerprints, missing name checks, and cases exempt from fingerprints because the children are under 14-years old. An unworkable case is an incomplete petition or application. *Ad hoc* reporting may include the number of Form I-485, *Application to Register Permanent Residence or Adjust Status* requests, employment-based applications for a given country, or how many family members have filed for a certain type of benefit. These reports may be saved in Adobe-PDF, Excel, or web page formats. *Ad-hoc* reports are not stored in CHAMPS.

Since the previously approved PIA, CHAMPS produces six new routine reports used by TSC management for management planning. There reports include:

³ The FD-258 MF record contains biographic data, fingerprint transmission data, and fingerprint response data. This record is stored to assist in the adjudication process. For more information, see DHS/USCIS/PIA-033 Immigration Benefits Background Check Systems (IBBCS), available at www.dhs.gov/privacy.

⁴ See DHS/USCIS/PIA-032 National File Tracking System (NFTS), available at www.dhs.gov/privacy.

⁵ See United States State Department Visa Bulletin data, available at <https://travel.state.gov/content/visas/en/law-and-policy/bulletin.html>.



G-22 Reports

CHAMPS tracks hours worked as they are linked to predefined functions known as “G-22 line items.” The G-22 line items identify the function performed by the adjudicator. Every immigration form and employment time and attendance data type is associated with a G-22 line item. TSC produces G-22 Reports that tracks and calculates the aggregate totals of production, and hours worked for the site, team, and individual employees at the TSC based on the G-22 line items. Individual employee productivity and overall statistical production is used for organizational analysis and performance appraisals.

Abeyance Report

CHAMPS produces a standard report referred to as the Abeyance Report for cases are pending adjudication. This report is provided to USCIS Headquarters offices and shows the number of pending cases (case counts) for specific case types, such as the number of pending pre-adjudicated cases, the number of pending fraud review,⁶ and the number of cases that are pending third-party investigations.⁷

Telework Reports

Telework reports capture the quarterly production summary statistics for telework participants. These reports may identify and capture the employee’s name, title, grade, start date, and days in the telework program for TSC federal employees.

Telework Site Inspection Reports

Telework site inspection reports detail information required by the USCIS telework inspection team for home visits of teleworking employees:

- Employee name;
- Address;
- Telephone numbers;
- Status (Core – days selected as core day);
- Telework days;
- Employee supervisor name;
- Employee supervisor office telephone number; and

⁶ Cases that were referred to the Fraud Detection & National Security Directorate (FDNS) and are pending a fraud review.

⁷ Cases that have been referred to U.S. Immigration and Customs Enforcement (ICE) or another agency outside of USCIS for investigation and the cases waiting for the third-party investigation response.



- System note: “x” after the employee’s name indicates no record found for the pay period selected.

Visa Availability Report

Visa availability report consists of a summary count of visas available for all countries and a summary count of visas available for specific countries or another country, when a user has a need to know, to run a report. The visa availability is based on the State Department’s Visa Bulletin, which is updated monthly.

Pending Reports

Pending reports display properly filed cases by applicants, petitioners, or requestors, without a final adjudication decision. The pending report, which can be exported as an Excel file, includes specific case data such as Receipt Number, A-Number, Form Type, Date In, and National File Tracking System (NFTS) location, all of which is saved on a secured shared drive.

Reason for the PIA Update

USCIS is updating the CHAMPS PIA to describe the addition of the TSC employee emergency contact and telework information added to the employee profile of the Time and Attendance and Production Evaluation module. In addition, this PIA describes the migration of CHAMPS to a new cloud computing environment, as well as new information on the approved records retention schedules.

Emergency Contact Information

In order to prepare for continuity of operations during an emergency, CHAMPS maintains all TSC employees’ emergency contact information so managers can reach them during an emergency. In addition, an employee may provide up to three emergency points-of-contact. The following information is captured from the employee:

Employee’s Personal Information

- Employee’s business contact information (optional);
 - First Line Supervisor;
 - Second Line Supervisor;
 - Desk phone number;
 - Government-issued cell phone number;
 - Fax number;
 - Cubicle number;
 - Building number; and



- Floor number.
- Home address (street number, city, state, and zip code) (optional); and
- Home phone number (optional).

Emergency Point of Contact Information

- Contact's name (optional); and
- Contact's phone number (optional).

Telework Information

Once an employee is approved to telework, the type of telework schedule (core or episodic) is noted in CHAMPS along with the telework approval date. The expiration date of the telework agreement is also noted in CHAMPS to assist in managing renewals of the telework agreements. Employees designate the days they plan to telework in CHAMPS. Designating telework days is done one pay period in advance so the supervisor can review and work with the employee in the case any adjustments are needed. If changes to a telework schedule are needed within the current pay period, the employee contacts the supervisor to discuss the change outside of CHAMPS, which is then updated by the supervisor in CHAMPS.

Privacy Impact Analysis

In each of the below sections consider how the system has changed and what impact it has on the below fair information principles. In some cases there may be no changes and indicate as such.

Authorities and Other Requirements

The Immigration and Naturalization Act (INA), 8 U.S.C. Section 1101 et seq., is the legal authority for CHAMPS. Specifically, 8 U.S.C. Section 1103 charges the Secretary of Homeland Security (DHS) with the duty of administering and enforcing all laws relating to the immigration and naturalization of aliens.

CHAMPS is covered by the following System of Records Notices (SORNs):

- Benefits Information System,⁸ which covers information collected from principals and derivatives as part of its case management functions;
- Department of Homeland Security Emergency Personnel Location Records System of Records,⁹ which covers the employees and individuals who employees identify to be contacted in the event of an all emergency hazards; and

⁸ DHS/USCIS-007 Benefits Information System, 81 FR 72069 (Oct. 19, 2016).

⁹ DHS/ALL-014 Personnel Emergency Contact Information System of Records, 81 FR 48832 (Aug. 25, 2016).



- Department of Homeland Security Payroll, Personnel, and Time and Attendance Records,¹⁰ which covers the timekeeping data about the Texas Service Center personnel.

CHAMPS is a minor application under the USCIS Digital Innovation and Development-Information Technology (DID-IT) Amazon Web Services (AWS) accreditation boundary. CHAMPS was migrated to the Federal Risk and Authorization Management Program (FedRAMP) -approved AWS cloud environment, and received authorization to operate on November 13, 2017.¹¹ USCIS completed the DID-IT security assessment and authorization documentation in April 30, 2014, and was subsequently enrolled in the USCIS Ongoing Authorization Program.¹² Despite its enrollment in the USCIS Ongoing Authorization Program, DID-IT has not met all of its privacy compliance requirements.

The National Archives and Records Administration (NARA) approved the CHAMPS retention schedule (N1-566-09-05). USCIS retains information captured in CHAMPS for 15 years after the last completed action.

The information maintained in CHAMPS is not subject to the Paperwork Reduction Act.

Characterization of the Information

USCIS TSC is updating CHAMPS to collect employee emergency contact information (i.e., home address, phone numbers, and up to three emergency contact names and phone numbers) and employee telework information into the Time and Attendance module of CHAMPS. TSC employees enter their own contact information and desired telework days into the system, all of whom are required to do so accurately. This information advances the use of CHAMPS as a centralized repository of only for case management and to assist the TSC with managing telework and continuity of operations during an emergency.

Privacy Risk: There is a risk that CHAMPS now contains more employee information than is necessary based on the system's original purpose.

Mitigation: This risk is mitigated. The new information in CHAMPS allows USCIS TSC to contact its employees in the event of an emergency. This risk is further mitigated by the fact that much of the sensitive information in CHAMPS (e.g., home address and personal contact information, as well as emergency point of contact information) is optional.

Uses of the Information

¹⁰ DHS/ALL-019 Payroll, Personnel, and Time and Attendance Records System of Records, 80 FR 58283 (Sept. 28, 2015).

¹¹ FedRAMP is a government-wide program that provides a standardized approach to security assessment, authorization, and continuous monitoring for cloud products and services. Information is available at <https://marketplace.fedramp.gov/#/product/aws-us-eastwest?status=Compliant&sort=productName>.

¹² The Ongoing Authorization requires DID-IT, including Known Employer Document Library (KEDL), to be reviewed on a monthly basis to maintain its security posture and maintain its ATO.



The employee emergency contact information is used to respond to all emergencies, including technical, manmade or natural disasters, or to participate in exercises. TSC employees also identify other individuals to contact in the event of an emergency. This information provides managers with the ability to reach employees during emergencies, and to better account for personnel during such times.

The telework information maintained in the Time and Attendance module of CHAMPS is used to assist TSC with the management of the telework program. Telework agreement implementation and renewal dates are tracked in CHAMPS, and employees can also schedule their telework days in CHAMPS. The telework information, such as employee telework schedules, enables CHAMPS to generate reports to permit the TSC to effectively manage the telework program and to plan telework site inspections.

Privacy Risk: There is a risk that the additional information in CHAMPS will be used for an activity inconsistent with the original purpose.

Mitigation: This risk is mitigated. Only authorized users may access employee information in CHAMPS, and individuals who do not wish to provide their home and emergency contact information are not required to do so.

Notice

This PIA Update provides individuals notice of changes associated with CHAMPS, while notice is also provided by the publication of DHS/ALL-014 Department of Homeland Security Emergency Personnel Location Records System of Records, which includes the collection of contact information necessary for DHS employees, contractors, and other individuals and family members in the event of an emergency. Notice is also provided about the collection of employee telework information through DHS/ALL-019 Payroll, Personnel, and Time and Attendance Records System of Records, which covers telework for reporting and compliance purposes.

Privacy Risk: There is a risk that individuals who are identified as emergency points of contact are not aware that their information is maintained in CHAMPS.

Mitigation: This risk is partially mitigated. While USCIS relies on employees to notify their points of contact that they have provided their contact information for this purpose, this PIA provides additional notice. The impacts of this risk are minimal due to the fact that the provision of this information is optional, and because CHAMPS only stores name and contact information for use in the event of an emergency.

Data Retention by the project

NARA approved the CHAMPS retention schedule (N1-566-09-05) on August 3, 2009. CHAMPS provides a centralized repository of data for case review, case management, production



evaluation, time and attendance tracking, and reporting. The modules of CHAMPS are scheduled as follows:

1. **Case Review and Management of Immigrant Petitions and Applications for Benefits:** Data is extracted from CLAIMS 3 and includes applicant customer demographics, attorney information, and receipt number. Data is deleted 5 years after entry in the master database.
2. **Time and Attendance:** Adjudicators enter their own time and attendance data (and productivity data for forms not handled by CLAIMS 3). Employee pay is not generated from this system. System-generated employee time and attendance reports are used for data entry into the payroll system. The employee time and attendance reports generated by the system are used for data entry into the payroll system. Time and attendance records are deleted and destroyed after a U.S. Government Accountability Office (U.S. GAO) audit or when the record is 6 years old, whichever is sooner;
3. **Reporting:** Recurring and *ad hoc* reports are available in hard copy or in Microsoft Excel format. All reports other than those for time and attendance as described above are destroyed and deleted when they are no longer needed for agency business;

NARA has developed General Records Schedule 5.3 item 020, Employee emergency contact information, which covers records collected in support of CHAMPS Emergency Contact Information Module. Records are considered to be temporary and will be destroyed when obsolete or upon the separation or transfer of the employee. To ensure CHAMPS has the most current information, employee emergency contact information is retained in the system until it is updated by the employee. If the employee leaves the TSC (e.g., relocates, retires), the employee profile is disabled and all of the employee-entered data is deleted, including the employee's home address and emergency contact(s).

Privacy Risk: There is a risk that USCIS TSC will retain information in CHAMPS for longer than necessary.

Mitigation: This risk is mitigated. While there are always risks associated with any retention of PII, USCIS manages the information in CHAMPS in accordance with the approved NARA retention schedule in compliance with federal records policy.

Information Sharing

There are no changes to the internal or external sharing and disclosures described in the DHS/USCIS/PIA-012 CHAMPS PIA.

Redress

There are no changes to the redress procedures described in the original CHAMPS PIA. Employees may use CHAMPS to access and update their user profiles, including emergency contact and telework information. Employees set their telework schedule one pay period in



advance (or can update them a pay period in advance if already entered), so that supervisors know when the employee plans to telework. During the pay period, if the employee wants to make a change, they must coordinate or communicate that change with his or her supervisor outside of CHAMPS, who can make the change in CHAMPS.

Auditing and Accountability

CHAMPS is housed in the FedRAMP-approved AWS US East/West cloud environment, at a moderate confidentiality that allows USCIS to host PII.¹³ Amazon US East/West is a multi-tenant public cloud designed to meet a wide range of regulatory requirements, to include Government compliance and security requirements.¹⁴ FedRAMP is a U.S. Government-wide program that delivers a standard approach to the security assessment, authorization, and continuous monitoring for cloud services. USCIS continues to employ technical and security controls to preserve the confidentiality, integrity, and availability of the data, which are validated during the security authorization process.¹⁵ These technical and security controls limit access to USCIS users and mitigate privacy risks associated with unauthorized access and disclosure to non-USCIS users.

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Approval Signature

Original, signed copy on file with the DHS Privacy Office

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¹³ <https://marketplace.fedramp.gov/#/product/aws-us-eastwest?status=Compliant&sort=productName>.

¹⁴ Public clouds are owned and operated by third-party service providers whereas private clouds are those that are built exclusively for an individual enterprise.

¹⁵ The security authorization process substantiates the implementation of security standards and guidelines for information systems.