

U.S. OFFICE OF PERSONNEL MANAGEMENT (OPM) OPEN GOVERNMENT NOTICE AND REQUEST FOR PUBLIC COMMENT

Date: December 23, 2025

Comment period: December 23, 2025 - January 24, 2026 (32 days)

Purpose of This Notice: The U.S. Office of Personnel Management (OPM) is seeking public comment on a proposal to use web measurement and customization technologies in the USAJOBS system that qualify as Tier 3 uses under the U.S. Office of Management and Budget (OMB) Memorandum M-10-22, Guidance for Online Use of Web Measurement and Customization Technologies (June 25, 2010) ¹.

Tier 3 technologies involve multi-session tracking using information that can be associated with an individual user. OMB guidance requires agencies to provide clear notice and an opportunity for public comment for at least 30 days before authorizing these uses.

How to Submit Comments: Please email comments to privacy@opm.gov
Subject line: Open Government Comments - USAJOBS.

All comments received during the comment period will be reviewed by OPM's privacy program, USAJOBS program staff, and other relevant OPM officials.

What Happens Next: OPM will review public comments and consider whether changes are needed before finalizing this proposal. If finalized, OPM will update the USAJOBS Privacy Policy, available at: <https://help.usajobs.gov/privacy>. OPM will also update Terms and Conditions presented to users upon login to provide notice of the web measurement and customization feature, as well as opt in consent.

Summary of the Proposal: OPM proposes to enhance its ability to evaluate the effectiveness of federal recruitment and hiring efforts by using web measurement tools to understand how job seekers arrive at and use USAJOBS.

Specifically, OPM would:

- Capture the original recruitment or traffic source (such as paid advertisements, campaigns, or social media) that led a user to USAJOBS;
- Link that information, in aggregate, to hiring outcomes (such as whether applicants were qualified, referred, or selected); and
- Share aggregate reporting with federal agencies so they can better assess recruitment strategies and return on investment.

¹ https://obamawhitehouse.archives.gov/sites/default/files/omb/assets/memoranda_2010/m10-22.pdf

To support this effort, OPM would pass a hashed USAJOBS User ID to Google Analytics. This hashed identifier would be used solely to associate recruitment source information with aggregated hiring outcomes in USA Staffing. No personally identifiable information would be shared with agencies or used for individual-level decision-making. Job seekers will be informed of this data collection through updates to the USAJOBS Privacy Policy and the updated Terms and Conditions pop-up banner presented upon login.

OMB M-10-22 Requirements (Attachment 3):

OMB Memorandum M-10-22 requires agencies using Tier 3 web measurement and customization technologies to address the following items. OPM's proposed approach is summarized below.

- 1. Purpose of the Technology.** To evaluate the effectiveness and return on investment of federal recruitment and marketing efforts by linking recruitment sources to aggregate hiring outcomes.
- 2. Usage Tier, Session Type, and Technology.** Tier 3 over multiple sessions using web measurement technologies that may be associated with individual users.
- 3. Nature of the Information Collected.** A hashed USAJOBS User ID is used to associate recruitment source information with aggregated applicant outcome data (for example, whether applicants were qualified or selected).
- 4. Purpose and Use of the Information.** The information will be used to produce aggregate reports that help agencies understand which recruitment strategies are most effective.
- 5. Information Sharing.** OPM will share aggregate data only with federal agencies. Access to individual-level data will be limited to the minimum number of authorized OPM system administrators necessary to produce aggregated reports.
- 6. Privacy Safeguards.** Hashed identifiers are used in place of direct identifiers. No individual-level data is shared externally. Access controls limit who can view and process the data.
- 7. Data Retention.** The retention period of information collected from web measurement and customization technologies will be consistent with approved Federal record schedules.
- 8. Whether the Technology Is Enabled by Default.** The technology will be enabled by default. This approach allows OPM to produce complete and accurate aggregate analyses of recruitment effectiveness.

9. How Users May Opt In. Job seekers opt in to this feature by accepting the USAJOBS Term and Conditions. OPM plans to add the highlighted sentence to the Terms and Conditions to provide notice individuals of web measurement and customization technologies:

This is a U.S. Office of Personnel Management (OPM) federal government computer system that is for authorized use only. Authorized uses include: job searching, applying for jobs, updating and completing a USAJOBS profile, managing documents and other standard uses available to all users on USAJOBS.gov. All communications and data on this system (including data transiting, traveling to or from, or stored) is subject to monitoring. **OPM collects and aggregates limited web analytics on traffic sources, campaigns, and hiring outcomes to improve recruitment effectiveness.** By using this system, you consent to the monitoring, interception, recording, and searching of all communications and data on this system at any time and for any official purpose by OPM or by any authorized person or entity, including other government entities or law enforcement authorities. Unauthorized use of the system is prohibited and is subject to criminal and civil penalties. Your acknowledgment and consent covers all use of the system, including work-related use and personal use without exception.

Job seekers have the option to *Agree* or to *Go Back* when presented with this information. Job seekers who do not agree to opt in may select the *Go Back* button.

10. Access to Services After Declining to Opt-In. Users who decline to opt in will still be able to search for and view federal job openings.

11. Third-Party Vendors. The third-party vendor used for web measurement is Google Analytics.