



Privacy Impact Assessment
for the

**Accountability Information Management System
(AIMS)**

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Abstract

The Accountability Information Management System (AIMS) is operated by the Office of Personnel Management's Merit System Accountability and Compliance, Agency Compliance and Evaluation (ACE) office. AIMS provides a central repository of all data created by ACE as a result of human resources management evaluations and the adjudication of classification and pay/leave claims cases. AIMS provides ACE with an efficient system to conduct data and trend analysis of agency evaluation results. This Privacy Impact Assessment is being conducted because AIMS collects, uses, and maintains personally identifiable information.

Overview

AIMS is operated by the Office of Personnel Management's (OPM) Merit System Accountability and Compliance (MSAC), Agency Compliance and Evaluation (ACE) office to: (1) support OPM in carrying out its statutory mission to maintain oversight over agency human resources programs; and, (2) to issue appellate decisions in response to classification appeals, pay and leave claims.

In its oversight role, MSAC evaluates Federal agency human resources programs to determine whether they are effective, efficient, and comply with merit system principles and related civil service requirements. MSAC conducts its evaluations through a combination of OPM-led reviews and participating in agency-led reviews. The evaluations may focus on all or some of the four systems of the Human Capital Framework: strategic planning and alignment of human resources to mission, performance culture, talent management, and evaluation systems. Once evaluations are complete, MSAC issues reports that may identify required corrective actions, which agencies must show evidence of implementing, and recommendations for agencies to improve their systems and procedures.

Also in its oversight role, MSAC conducts special cross-cutting studies to assess the use of human resources (HR) authorities and flexibilities across the government. In addition, MSAC reviews agencies' requests to appoint political appointees to competitive or non-political excepted service positions



to determine whether such appointments are free of political influence.

In its appellate role, MSAC adjudicates classification appeals, job grading appeals, Fair Labor Standards Act claims, compensation and leave claims, and declination of reasonable offer appeals. This appeals process provides Federal employees with administrative due process rights to challenge compensation and related agency decisions without having to resort to seeking redress in Federal courts.

AIMS provides a central repository for storage of all data created by ACE resulting from its oversight and appellate activities. In addition, ACE uses AIMS for administrative purposes, such as tracking all evaluation activities by fiscal year, reporting ACE program goals, and tracking travel and training budget information.

The information in AIMS includes reports of findings; agency requests to appoint previous political appointees; classification appeals and pay and leave claims from Federal employees; internal ACE records, including budget tracking for travel and training; and ACE performance goals. This information is used to analyze agency violations of human capital regulations and/or laws associated with violations; and to document OPM decisions regarding appeals related to agency classification of jobs/grade-levels and related to pay entitlements and leave claims from Federal employees. The information related to ACE's evaluations in its oversight role generally do not contain personally identifiable information, although some correspondence with limited PII may be present. The information related to ACE's appellate role contains PII that may include names, addresses, employer information, date of birth, and pay records which may be provided to support claims. Each record created in AIMS is assigned a unique case number, which is used to track and retrieve the records.

AIMS is maintained by a vendor under contract with OPM. The vendor provides a fully managed support infrastructure service including: supporting hardware and software, secure computing facilities, Internet gateway communications security, system administration, and system and application security services operated in compliance with all applicable OPM IT security and privacy requirements.



Section 1. Authorities and Other Requirements

1.1. What specific legal authorities and/or agreements permit and define the collection of information by the project in question?

OPM is required to design a set of systems to assess and oversee the effectiveness of agency human capital and investigate violations of civil service law, rule, or regulation pursuant to 5 U.S.C. §§ 1103 (c), 1104 (b)(2), and 1104 (c). In addition, 5 C.F.R. §§ 5.2 and 10.3 permit OPM to review the human resources management programs and practices of Federal agencies and report to the head of the agency and the President on the effectiveness of those programs and practices, including whether they are consistent with the merit system principles.

OPM is also required to review agency requests to appoint current or recent political appointees to competitive or non-political excepted service positions to determine whether appointments comply with merit system principles and applicable civil service laws pursuant to Public Law 114-136 and 5 C.F.R. part 250.

In its appellate role, 5 U.S.C. §§ 5110, 5112, and 5346 and 5 C.F.R. §§ 511.604, 511.609, and 511.616 provide the authority for OPM to determine if agencies are placing positions in classes and grades in conformance with or consistent with published standards; 31 U.S.C. § 3702 and 5 C.F.R. § 178.102 provide the authority for OPM to settle Federal civilian employees' compensation and leave claims; 29 U.S.C. § 204(f) and 5 C.F.R. §§ 551.705 and 709 provide the authority for the appellate program to adjudicate Federal employee Fair Labor Standards Act claims; and 5 U.S.C. § 5366 and 5 C.F.R. § 536.402 provide the authority for the appellate program to adjudicate Federal employee appeals for termination of benefits on the grounds the employee declined a reasonable offer.

1.2. What Privacy Act System of Records Notice(s) (SORN(s)) apply to the information?

The OPM/GOVT 1 General Personnel Records, OPM/GOVT-2 Employee Performance File System Records, and OPM/GOVT 9 File on Position Classification Appeals, Job Grading Appeals, Retained Grade or Pay Appeals,



Fair Labor Standards Act Claims and Complaints, Federal Civilian Employee Compensation and Leave Claims, and Settlement Accounts for Deceased Civilian Officers and Employees SORNs apply to the information in AIMS.

1.3. Has a system security plan been completed for the information system(s) supporting the project?

The Authorization to Operate (ATO) for AIMS was signed on September 21, 2016, and includes a system security plan.

1.4. Does a records retention schedule approved by the National Archives and Records Administration (NARA) exist?

No. There is no current NARA-approved records schedule for the records in AIMS. Records are currently treated as permanent until a new schedule is approved. OPM expects to request the Archives to approve a 10-year disposition after any given case is closed.

1.5. If the information is covered by the Paperwork Reduction Act (PRA), provide the OMB Control number and the agency number for the collection. If there are multiple forms, include a list in an appendix.

Information contained in AIMS is not subject to the requirements of the PRA.

Section 2. Characterization of the Information

2.1. Identify the information the project collects, uses, disseminates, or maintains.

AIMS collects, uses, disseminates, or maintains ACE's reports of findings; agency requests to appoint previous political appointees; classification appeals and pay and leave claims from Federal employees; declination of reasonable offer appeals; records for settling disputed claims for unpaid compensation due deceased Federal employees; internal ACE records, including budget tracking for travel and training; and ACE performance goals. The records may include the following information about individuals: name, addresses, dates of birth, work location addresses, pay records, and



current and past employment information about individuals who are current or former Federal employees and applicants for Federal employment.

2.2. What are the sources of the information and how is the information collected for the project?

The records in AIMS related to ACE's oversight role are obtained from the agency being evaluated, via requests for policies and practices and information regarding hiring activity and hiring practices as well as through interviews with or surveys of agency employees. AIMS also includes information about hiring actions and individuals hired from OPM's EHRI system, the central repository for Federal employee data; information about how a job was advertised from USAJobs; and information about the hiring action and process from USAStaffing. Agency websites and internet searches also provide relevant information to AIMS. While the evaluation process may include an examination of agencies' employee records, including hiring actions, performance appraisals, awards, and training files, all of which may contain sensitive PII, those records are not transferred into or recorded in AIMS.

The records in AIMS related to ACE's appellate function are received from the individual appellant/claimant. Information may also be obtained from the appellant/claimant's employing agency.

2.3. Does the project use information from commercial sources or publicly available data? If so, explain why and how this information is used.

While commercial and publically available information is used in evaluation planning, it is not directly recorded in AIMS. Evaluators analyze this information to inform its conclusions about the agency's programs, and these conclusions are recorded in reports maintained in AIMS.

2.4. Discuss how accuracy of the data is ensured.

Information collected from agencies and from data extracts from review of records during an evaluation is assumed to be accurate as sources are trusted primary sources of information. MSAC cannot make assurances for



the information from the external sources referenced in section 2.3. As such, the sources are used to holistically inform evaluations during the planning phase and are not used as a sole basis to draw conclusions and make recommendations. Conclusions drawn in evaluation reports originate from analysis of primary and internal secondary sources referenced in section 2.2.

The appellate staff ensures accuracy of information by creating technically sound entries and verifying uploaded information against original case files. Additionally, records may be examined periodically by appellate staff members for completeness.

2.5. Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: There is a risk that the information in the system is not accurate.

Mitigation: This risk is mitigated by requiring evaluators to follow detailed procedures outlined in the evaluation guide. Evaluators compare multiple sources before drawing positive or negative conclusions in written reports and also consider the credibility, reliability, and validity of the sources of information. For example, the evaluator must consider the sample size and response rates if using a survey when compared to the total population of the agency in order to determine whether the rates warrant a further look. In addition, interviews with agency managers are conducted and individual records are reviewed in an effort to corroborate findings and obtain a holistic view of an agency's processes.

Privacy Risk: There is a risk that the system will collect, use, maintain or disseminate more PII than is necessary to meet the oversight or appellate function of the system.

Mitigation: This risk is mitigated by identifying and redacting all unnecessary PII before uploading information into AIMS.



Section 3. Uses of the Information

3.1. Describe how and why the project uses the information.

The information in AIMS is used to report on ACE's oversight activities in evaluating agencies' compliance with human capital laws and regulations and to conduct its appellate function. In particular, ACE uses the information to generate a variety of reports to respond to requests for information from the White House, Congressional committees, members of Congress, oversight agencies such as the GAO and MSPB, and other Federal agencies. ACE also uses the information in evaluating appeals and to conduct data and trend analyses of claims and appeals, compliance, and various government-wide human capital issues.

Internal ACE records enable MSAC to prepare budget proposals, resource justifications, and cost analysis documents, as well as to track usage of allocated funds for travel. In addition, internal performance information is used to monitor accomplishments and progress of performance goals and to produce data-driven performance snap shots in real time.

3.2. Does the project use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly? If so, state how OPM plans to use such results.

The system does not use technology to conduct electronic searches, queries or analyses in an electronic database to discover or locate a prescriptive pattern or anomaly.

3.3. Are there other programs/offices with assigned roles and responsibilities within the system?

Access to AIMS is limited to ACE staff only, who can access the system only through their government-issued laptop. AIMS staff may provide information in the form of reports to others within OPM, but only regarding trends and never including any information about individuals.



3.4. Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: There is a risk that the AIMS information may be accessed and used by persons without an appropriate need to know.

Mitigation: This risk is mitigated through the system design and access controls that ensure AIMS information is available only to authorized users. Only persons with established accounts may access the system, and only persons with the Administrator role may create or modify user accounts. Users can only access records in accordance with the level of their role (e.g., certain users have only Reviewer access). In addition, once per month, the system owners review event and audit logs to ensure there has been no unauthorized access to the system.

Privacy Risk: There is a risk that the information may be accessed by authorized users for an unauthorized purpose.

Mitigation: This risk is mitigated by providing training on how to appropriately use AIMS. This includes assigning unique case numbers for each record created which is used to track and retrieve evaluation-related and reference records thereby reducing the risk associated with PII. Controls are also in place to safeguard the system and limit user rights to specific functions.

Section 4. Notice

4.1. How does the project provide individuals notice prior to the collection of information? If notice is not provided, explain why not.

AIMS does not generally collect information directly from individuals for evaluations. Rather, AIMS contains information compiled from several other sources. This high level information does not generally contain information concerning individual persons or members of the public to whom notice would be necessary.

For appeals/claims, AIMS does not provide notice directly to individuals, but notice is provided through this PIA and the SORNs identified in Section 1.2.



4.2. What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project?

Individuals do not have the option to consent to particular uses of their information in AIMS.

4.3. Privacy Impact Analysis: Related to Notice

Privacy Risk: There is a risk that individuals are not aware that AIMS collects and uses their information.

Mitigation: This risk is mitigated via the publication of this PIA. The risk to individuals is minimal because the system is not intended to collect, use, or maintain information about individuals during ACE's evaluation activities; and those individuals involved in the appeals process are aware that they are supplying their information to ACE in order for their appeals to be adjudicated.

Section 5. Data Retention by the project

5.1. Explain how long and for what reason the information is retained.

MSAC/ACE has been working with the OPM Records Office to create a record schedule that will be submitted to the National Archives and Records Administration (NARA) for appraisal and final approval. In the meantime, records are treated as permanent until a records schedule is in place.

5.2. Privacy Impact Analysis: Related to Retention

Privacy Risk: There is a risk of retaining information longer than necessary for its intended purpose.

Mitigation: This risk is being mitigated by ACE working with the OPM Records Officer to carefully consider the business need to retain the information only for as long as is necessary for its intended business use and submit a schedule to NARA for review and approval. Until a schedule is approved, however, this risk remains unmitigated.



Section 6. Information Sharing

6.1. Is information shared outside of OPM as part of the normal agency operations? If so, identify the organization(s) and how the information is accessed and how it is to be used.

Completed evaluation reports are sent electronically in a letter to agency points of contact such as the Chief Human Capital Officer, HR Director, and Inspector General. These parties use the report to determine actions needed to improve efficiency, effectiveness, or compliance. Once this report is sent, the report is recorded in AIMS. These reports do not contain any personally identifiable information.

As part of the appellate program's adjudicative process, information is often shared with the appellant/claimant's employing agency. This information includes incoming appeals/claims and appellant/claimant responses to agency reports. Additionally, final appeal decisions are sent electronically or through the mail to claimants, appellants, and HR Directors at the claimant/appellant's employing agency. Once the decision is sent, the decision is recorded in AIMS.

6.2. Describe how the external sharing noted in 6.1 is compatible with the SORN noted in 1.2.

The only external disclosures of information from AIMS that may contain PII are those related to ACE's appellate function. Providing information to an appellant's employing agency is consistent with the purpose of the OPM/GOVT 9 SORN, whose purpose is to document the processing and adjudication of a position classification appeal, a job grading appeal, a retained grade or pay appeal, an FLSA claim or complaint, compensation and leave claims, or disputes concerning the settlement of the account for a deceased Federal civilian officer or employees. Routine Use "o" covers these disclosures:

- o. To provide a copy of a decision issued in response to classification, job grading, and retained grade and pay appeals; FLSA claims and complaints, compensation and leave claims, or disputes concerning the settlement of the account for a deceased Federal civilian officer or employees to the employing



and/or former employing agency and/or other Federal agencies to the extent that information from a decision is relevant and necessary to the agency's administration of these programs.

6.3. Does the project place limitations on re-dissemination?

No. There are no express limitations on re-dissemination of the information that ACE provides outside of OPM.

6.4. Describe how the project maintains a record of any disclosures outside of OPM.

ACE maintains records of the appellate decisions that are provided to employing agencies and regarding the reports that it provides to entities outside of OPM.

6.5. Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk that the information in AIMS will be shared for purposes other than the stated purposed of the AIMS program.

Mitigation: This risk is mitigated because the system is not designed to share information between its users or agencies, or otherwise outside of OPM. Any appellate decisions that are provided outside of OPM are provided only to those at an employing agency with a need to know.

Section 7. Redress

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

Individuals do not have direct access to information in AIMS. The information in AIMS that is used for evaluations generally contains no PII. Information about appeals does contain PII but is not available to the individual via direct access to AIMS. An individual may, however, request access to information by following the process set out in the relevant SORN identified in section 1.2 and by complying with OPM's Privacy Act regulation at 5 C.F.R. part 297.



7.2. What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?

The information in AIMS that is used for evaluations generally contains no PII. Information about appeals does contain PII but is not available to the individual via direct access to AIMS. An individual may, however, request that any inaccurate or erroneous information about them that has come to their attention be amended by following the process set out in the relevant SORN identified in section 1.4 and by complying with OPM's Privacy Act regulation at 5 C.F.R. part 297.

7.3. How does the project notify individuals about the procedures for correcting their information?

Notice is provided through the publication of this PIA and via the relevant SORNs identified in Section 1.4.

7.4. Privacy Impact Analysis: Related to Redress

Privacy Risk: There is a risk that individuals may not have access to or be able to correct their information contained in AIMS.

Mitigation: While individuals do not have direct access to information in AIMS, this risk is mitigated by providing them with general access to information contained in OPM systems of records by following the procedures outlined in the applicable SORN referenced in Section 1.2.

Section 8. Auditing and Accountability

8.1. How does the project ensure that the information is used in accordance with stated practices in this PIA?

Access to data stored in AIMS is limited to ACE staff only. The system owners review audit and event logs monthly to determine whether any unauthorized access to AIMS has occurred. In addition, training specific to AIMS is provided to users to inform them of acceptable access and use of the information in the system.



8.2. Describe what privacy training is provided to users either generally or specifically relevant to the project.

All OPM staff and contractors with access to OPM's IT resources must complete OPM's Annual IT Security and Privacy Awareness Training. A role-based training program for AIMS was developed within MSAC for those with an Administrator role in AIMS. Those administrators, in turn, provide AIMS training to all system users.

8.3. What procedures are in place to determine which users may access the information and how does the project determine who has access?

ACE management decides who within ACE will have administrative rights to create new accounts, determine permissions, and change configuration settings of the system. Administrators receive requests for new user accounts from ACE management. These requests will include the reason for access. The Administrator verifies that the new user has a need to know the information in the system and evaluates the appropriate access level. Users can only access records in accordance with the level of their role (Administrator, Evaluator, or Reviewer).

Users can only access AIMS from their OPM issued laptop or computers and must have an account in addition to a PIN-enabled identification card (PIV card) in order to login to the system.



8.4. How does the project review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within OPM and outside?

AIMS program manager will coordinate with the Chief Information Officer (CIO), Chief Privacy Officer (CPO) and Office of general Counsel (OGC) to review and assess the appropriateness of any requested new uses of information in the system.

Responsible Officials

Michael Quinto, System Executive Sponsor
Supervisory Program Manager, MSAC

Approval Signature

Signed Copy on File with the Chief Privacy Officer

Kellie Cosgrove Riley
Chief Privacy Officer