Privacy Impact Assessment for

Enterprise Human Resources Integration Data Warehouse

(EHRI DW)

07/11/2019

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Abstract

The Enterprise Human Resources Integration (EHRI) Data Warehouse (DW) is owned and operated by the Office of Personnel Management (OPM) Office of the Chief Information Officer (OCIO). EHRI DW is the Federal government's source for integrated Federal workforce information and includes career lifecycle information that encompasses human resource data, training data, and payroll data. This Privacy Impact Assessment is being conducted because the EHRI DW collects, maintains, disseminates, and uses personally identifiable information.

Overview

The Enterprise Human Resources Integration Data Warehouse (EHRI DW) is owned and operated by the Office of Personnel Management (OPM) Office of the Chief Information Officer (OCIO). Data warehouses are used to correlate broad business data to provide greater insight into performance toward a mission or goal. OPM's mission is to provide official government-wide human resources data and enable technology to support the federal employee lifecycle through informed human capital decision making. The collection of information in the EHRI DW from a wide range of federal sources enables that mission.

EHRI DW is the Federal government's source for integrated Federal workforce information and includes career lifecycle information. The system receives information from Federal agency data providers that submit data representative of their agency, as well as from data providers who submit data representing multiple agencies as shared service providers. This information includes: human resources status files, which are a snapshot of employees within an agency on the last day of each month; human resources dynamic files, which are files of personnel actions (generally those items reported on standard form 50; training information; and payroll information. The data files are transmitted securely and validated and processed for storage into EHRI DW.

EHRI DW provides workforce analytic and planning capabilities to improve human capital management across the federal employee base. Within EHRI DW is a core set of standard reports with custom report development capability provided through an industry best-practices reporting and analysis tool. It provides users the ability to produce data quality reports, which the system makes available to agencies and providers, to identify data errors

and inconsistencies with Federal regulations. Through the reports, users have access to workforce planning, analysis and forecasting tools to meet the Federal workforce planning requirements. Other reporting tools allow for individual employee lookups to view history across the employee's Federal career. These strategic tools are accessed by Human Resources (HR) Specialists, report writers, and executives to determine current needs, forecast future requirements, and report on other HR-related issues. EHRI DW provides a consistent, timely, and secure source of federal employee data. Therefore it enhances the reporting capabilities across the Federal workforce for advanced analysis by agencies and operating units.

Section 1.0. 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?

In general, OPM collects and maintains the information in EHRI DW pursuant to 5 U.S.C. §§ 1302, 2951, 3301, 3372, 4118, 8347, and Executive Order 9397, as amended by Executive Orders 13478, 9830, and 12107. In addition, 5 CFR § 9.2, Reporting Workforce Information, authorizes OPM to establish standards to require all Executive agencies to report information relating to civilian employees to include positions and employees in competitive, excepted, and senior executive services.

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

OPM GOVT-1 General Personnel Records:
https://www.opm.gov/information-management/privacy-policy/sorn/opm-sorn-govt-1-general-personnel-records.pdf

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

Yes, the EHRI DW System Security Plan was signed on 4/11/2019.

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

There is currently no approved records schedule specific to the records contained in this system.

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.

The PRA does not apply to the EHRI DW because information is not collected directly from the public.

Section 2.0. Characterization of the Information

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

EHRI DW collects, uses, disseminates, and maintains Federal personnel information including: Full name, Social Security number (SSN), employment history, current position information, performance appraisal information, work location and business contact information, compensation and benefits information, personal contact information including phone number(s), and mailing & email addresses, as well as training information from Learning Management Systems (LMS), and employee's retirement information.

EHRI DW is also a reporting system for the human resources, payroll, and training workforce information sent from Executive Branch agencies. The business intelligence reporting applications provide on-demand and user defined query, drill down reporting, and analysis capabilities. Ad-hoc queries are executed on a number of subject areas including (but not limited to): age, agency, employee, payroll, performance appraisal, personnel action, position, and retirement. The tool enhances strategic decision-making by delivering visual graphic capability with dashboards and executive summaries.

A full explanation of information captured in EHRI DW is contained in the Guide to Human Resource Reporting (GHRR) and the Guide to Retirement Data Reporting (GRDR). Links to these documents are:
- https://www.opm.gov/policy-data-oversight/data-analysis-documentation/data-policy-guidance/#url=HR-Reporting
- https://www.opm.gov/policy-data-oversight/data-analysis-documentation/enterprise-human-resources-integration/#url=Retirement-Reporting

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

EHRI DW consists of standard data interfaces for the collection of HR, payroll, and training data and integrates information from various sources to provide a comprehensive view of the Federal workforce in a secure system environment that meets Federal data standards and certification requirements. EHRI DW receives data files securely transmitted from agencies that submit data used by their agency, as well as other data providers who submit data representing multiple agencies as shared service providers. Workforce employee data are transmitted securely to EHRI DW as files containing employee status, HR dynamics actions, payroll, and training data.

The following agencies and other data providers transmit information to EHRI DW. The EHRI DW does not directly collect information from individuals.

- Air Force
- Air National Guard Units (Title 32)
- Broadcasting Board of Governors
- Defense Finance and Accounting Service
- Defense Logistics Agency
- Department of Agriculture
- Department of Energy
- Department of Health and Human Services
- Department of Interior
- Department of State
- Department of the Army
- Department of the Navy
- IBM - HR Links
- IBM - HR Smart
- National Aeronautics and Space Administration
- National Business Center
- Office of Administration
- Commodity Futures Trading Commission
- Department of Homeland Security
- Department of Justice

- Department of Treasury
- Export-Import Bank of the United States
- General Services Administration
- National Science Foundation
- Office of Navajo and Hopi Indian Relocation
- Smithsonian
- United States Government Printing Office
- SAP
- Learn.com
- GP/Plateau
- GeoLearning (eLearning)
- Department of Commerce
- Small Business Administration
- Defense Nuclear Facilities Safety Board
- US Agency for International Development
- Department of Energy
- Defense Commissary Agency
- Office of Personnel Management
- Railroad Retirement Board
- Federal Trade Commission
- Selective Service System
- Office of Management and Budget
- Federal Maritime Commission
- Department of Labor
- Department of Justice
- Peace Corps
- Equal Opportunity Commission
- Federal Housing Finance Agency
- Federal Communications Commission

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

EHRI DW does not use publicly available data or information directly from commercial sources. Some of the providers listed in subsection 2.2 are commercial vendors who serve as HR, payroll, or training data providers for federal agencies in reporting data to EHRI DW.

2.4 Discuss how accuracy of the data is ensured.

The accuracy of the information provided to EHRI DW is the responsibility of all reporting Federal agencies. EHRI DW validates submitted files according to OPM's published guidelines by executing checks of both the data's format and its allowed values. The data files are validated and processed for storage into EHRI DW. Information in EHRI DW is indexed using information about each Federal employee to validate the employee's identity and ensure correct storage of data elements.

Further information on EHRI DW's acceptable data formats and values is documented in the Guide to Data Edits, the Guide to Personnel Data Standards, and the Guide to Processing Personnel Actions. These documents contain the technical information, reporting requirements, and data dictionaries outlining the data stored in the EHRI DW system. Those documents are available here:

- https://www.opm.gov/policy-data-oversight/data-analysis-documentation/data-policy-guidance/reporting-guidance/ge64.pdf
- https://www.opm.gov/policy-data-oversight/data-analysis-documentation/data-policy-guidance/#url=Data-Standards
- https://www.opm.gov/policy-data-oversight/data-analysis-documentation/personnel-documentation/#url=Processing-Personnel-Actions

2.5 Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: There is a risk that more information will be collected and maintained in the system than is needed for the business purposed for which it was collected.

Mitigation: This risk is mitigated by providing clear instruction to the agencies and shared service providers concerning what information should be submitted to EHRI DW, through the GHRR and GRDR.

Privacy Risk: There is a risk that the information in EHRI DW is not accurate, which can result in inaccurate reporting and analysis and incorrect workforce decisions.

Mitigation: This risk is mitigated at the agency level, as the accuracy of the information submitted by providers is the responsibility of the reporting agencies. In addition, this risk is mitigated in EHRI DW, which validates the submissions against published guides for reporting, data standards, and personnel file edits. Data files are measured against stated data quality error rates, which must not exceed 3%.

Section 3.0. Uses of the Information

3.1 Describe how and why the project uses the information.

EHRI DW supports OPM's mission to provide official government-wide human resources data and enable technology to support informed human capital decision making. It is designed to give a long-range view of data over time in order to perform data aggregation and analysis. EHRI DW provides workforce analytic and planning capabilities to improve human capital management across the federal employee base.

The information in EHRI DW is used to determine current workforce needs, forecast future requirements, and report on other HR-related issues and functions, such as current and former demographic breakouts of the federal workforce, employment verification, statistical analysis, and workforce planning. Data trends in the EHRI DW information are used to analyze retirements, promotions, reassignments, and other significant personnel actions and the information in the system is used to support forecasting tools projecting manpower target data, accession requirements and separations (by type), and optimizing to target levels. As a workforce planning tool, EHRI DW also helps determine projected deficiencies by occupation, grade, organizations units, or geographic location.

The information in EHRI DW is also used for such purposes as GAO Federal workforce audits and specialized studies. In addition, external entities, including the media, universities, and private citizens seek EHRI DW data via the Freedom of Information Act in order to learn more about activities of the federal government.

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.

EHRI DW information is accessed by business intelligence tools to aid in understanding the Federal workforce and its trends. This includes a customizable reporting tool providing authorized access to workforce data over time in order to provide trend analysis capability. EHRI DW's information provides workforce analytic and planning capabilities to improve human capital management across the federal employee base. Currently, the majority of statistical analysis is performed by OPM's OSI through data in SDM.

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

Yes, there are several OPM offices and programs with assigned roles and responsibilities who maintain authorized access to tailored, purpose-specific information queries and tables in EHRI DW based on role-based access controls, their job functionalities and responsibilities.   These include:

Office of Strategy and Innovation (OSI): OSI provides support to OPM and its Director by providing planning and analysis support through various reports. OSI responds to data calls from other government oversight entities, such as the General Accounting Office (GAO).

OSI also has responsibility for analyzing policy options, legislative changes, and trends that affect OPM's management of health and retirement benefits for Federal employees. To ensure benefits provide maximum value and security, OSI conducts actuarial and statistical analysis using data from EHRI DW's downstream repository known as the Statistical Data Mart (SDM). OSI disseminates information from EHRI DW to other program offices throughout OPM in support of OPM's mission, to agencies across the Federal government, FOIA requesters, and other entities where appropriate and permitted by law and policy.

Employee Services (ES): ES uses information from EHRI DW to develop and provide policy direction and leadership in designing, developing, and promulgating government-wide human resources systems and programs for recruitment, pay, leave, performance management and recognition, employee development, work/life/wellness programs, and labor and employee relations.

Merit System Audit & Compliance (MSAC): MSAC provides rigorous oversight to ensure that Federal agency HR programs are effective and adhere to merit system principles and related civil service requirements. Within the scope of their oversight, MSAC conducts HR evaluations of small agencies by examining a broad range of HR programs, including staffing and competitive hiring, performance management, and leadership and succession planning.

Retirement Services (RS): RS uses retirement data stored in the Retirement Data Repository (RDR) through an application within EHRI DW that enables data access required to adjudicate retirement claims. The application is known as the Retirement Data Viewer (RDV). The RDV app only accesses the RDR which is a separate database table for RS within the EHRI DW that is populated by a separate data feed. It provides a contextual view of retirement data and provides authorized, secure access to view paper-based scanned retirement documents used by agencies as part of pre-retirement counselling. In addition, retirement claim payment information is used to support the RS retirement calculator.

National Background Investigation Bureau (NBIB): NBIB investigators access EHRI DW data in order to adjudicate information regarding previous Federal employment collected during initial background checks. NBIB is authorized to conduct a background investigation upon receipt of a signed request from the subject of the investigation, which authorizes NBIB to gather the information required to complete the background investigation using EHRI DW data.

Internal agency support is performed by additional OPM organizations, including OCIO's Federal Data Solutions Data Management / Data Policy and program staff, OCIO's Program Office Support (PMO), Chief Information Security Officer, OCIO/HRS IT PMO's various technical support teams (developers, operations, system and database administrators, FedScope and Helpdesk staff), Enterprise Information Systems, and Office of Inspector General personnel.

3.4 Privacy Impact Analysis: Related to the Uses of Information
Privacy Risk: There is a risk that unauthorized users may access information and use it for purposes that are inconsistent with the personnel purposes for which it was collected.

Mitigation: This risk is mitigated through the use of role-based access controls, which authorize only designated individuals to access information they need to know to perform their job responsibilities.

Privacy Risk: There is a risk that authorized users may use information for unauthorized purposes, such as performing searches on themselves, friends, relatives, or neighbors. Authorized users may inappropriately disclose this information, either intentionally or unintentionally.

Mitigation: This risk is mitigated through the use of role-based access controls, which limits access only to the information authorized users require to perform their job responsibilities. In addition, OPM conducts periodic security audits, regularly monitors the system to identify anomalies, and requires users to agree to rules of behavior to indicate they understand and will adhere to appropriate data use.

Section 4.0. Notice

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

There is no notice provided directly to individuals from EHRI DW. EHRI DW does not collect information directly from individuals nor do individuals have direct access to EHRI DW. While individuals do not receive notice that their information will be collected and used in EHRI DW specifically, they are provided with notice concerning the collection and use of their information at the original point of collection through Privacy Act statements. Agencies' human resources staff who access their agencies' information in EHRI DW are provided with notice through the EHRI DW Privacy Policy. In addition, notice is provided via the OPM GOVT-1 General Personnel Records SORN and this PIA.

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

There is no ability for a federal employee to consent or decline to have their information included in EHRI DW. 5 CFR 9, Workforce Information, authorized OPM to establish standards to require all Executive agencies to report information relating to civilian employees including positions and employees in competitive, excepted, and senior executive services.

4.3 Privacy Impact Analysis: Related to Notice

Privacy Risk: There is a risk that individuals will not be aware that their information is collected, maintained, and disseminated in EHRI DW and that they may not understand how their information is being used.

Mitigation: This risk cannot be mitigated using the system, as EHRI DW does not collect information directly from individuals, nor do individuals have direct access to the system. However, the risk is mitigated at the point of collection when individuals are provided with Privacy Act statements that inform them of the human resources purposes for which their information is being collected and through the publication of the OPM GOVT-1 General Personnel Records SORN and this PIA. In addition, agencies whose human resources information is submitted to EHRI DW may disclose to their employees that their individual HR systems data is transmitted to OPM to support EHRI DW and agencies' HR staff are provided access to the EHRI DW Privacy Policy when accessing their agency's records in EHRI DW.

Section 5.0. Data Retention by the Project

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

The information in the EHRI DW does not currently have a NARA approved records retention schedule but the program will work with OPM's Records Officer to establish one with NARA. EHRI DW will retain the information in the system in order to facilitate workforce planning, analysis, and forecasting tools necessary to be able to fulfill Federal workforce planning requirements. Used as a workforce planning tool, EHRI DW's data helps determine projected vacancies by occupation, grade, organizations units, or geographic location. The information will also be retained in order to provide access to historical federal employee data. Through EHRI DW, historical information regarding turnover, aging workforce, retirements, and other statistics can be made available.

5.2 Privacy Impact Analysis: Related to Retention

Privacy Risk: There is a risk that the information will be retained for longer than is necessary to meet the business need for the records.

Mitigation: This risk is currently not mitigated. Without an approved NARA records schedule, the records in the system must be retained permanently. The program office will work with OPM's Records Officer to develop an approved schedule with NARA in order to identify the appropriate retention period and mitigate this risk.

Section 6.0. 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.

Yes. EHRI DW data providers, including staff in the agencies they represent, have access to their agency information via EHRI DW's PIV-enforced web site for the purposes of data quality reporting. This access is view-only and is restricted to information that each agency or provider is responsible for submitting to EHRI DW. This viewing-only access is provided for the purpose of data quality reporting and permits each agency or provider to identify areas for improvement in their submission to EHRI DW.

Information is shared with external agencies that have signed agreements with OPM through EHRI DW's Web Services, which enable limited, purpose-specific information queries and tables from the EHRI DW data to be shared securely. Currently, Defense Technical Information Center and Federal Acquisition Institute's Training Application System each use EHRI DW to verify Federal employment. Information is also shared from EHRI DW through business intelligence reporting tools to support specific data calls, such as FOIA or congressional reporting requests. In addition, HR business functions are externally supported by EHRI DW data; for example, the NBIB and the National Archives and Records Administration (NARA) verify Federal employees' Personnel Office Identifier (POI) through a customized business intelligence report.

OPM's Office of Strategy and Innovation (OSI) shares information from EHRI DW's Statistical Data Mart (SDM) with external agencies in accordance with its data release policy and as outlined in written agreements between the agencies and OPM. OSI also shares SDM data externally in support of FOIA requests or other general inquiries from external entities.

OPM's FedScope team provides support to the OPM offices and programs listed in section 3.3 related to their use of their business intelligence reporting tool that accesses data contained in EHRI DW's SDM. Their internal-to-OPM reporting tool provides a myriad of aggregate and detailed reporting capabilities to assist OPM in fulfilling its tasks related to Federal workforce projections.

In addition, FedScope provides aggregated workforce data from EHRI DW's SDM, to the public via the website https://www.fedscope.opm.gov. Through

this public facing website, FedScope provides statistical information about the Federal civilian workforce that is used by Federal government agencies, the White House, researchers, the media, and the general public to review and/or research information on Federal workforce data. Although FedScope provides the ability for users to drill down to an individual level, no individually identifiable data is made available to the public.

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

EHRI DW's external sharing is consistent with the purposes for which the information was collected, as described in the OPM GOVT-1 General Personnel Records SORN, to include: "... screening qualifications of employees; determining status, eligibility, and employee's rights and benefits under pertinent laws and regulations governing Federal employment; computing length of service; and other information needed to provide personnel services [and to] locate individuals for personnel research." External disclosure of the information in EHRI DW is made only after validating an appropriate routine use published in the SORN or after identifying a relevant Privacy Act exception.

6.3 Does the project place limitations on re-dissemination?

OPM does not explicitly limit the re-dissemination of EHRI DW information by agencies, but agencies' use and disclosure of the information is subject to the OPM GOVT-1 General Personnel Records SORN. In general, external disclosures of information to third parties is governed by a signed written agreement outlining the terms of use and limiting onward dissemination of the information. In addition, OPM's Office of Strategy and Innovation (OSI) maintains Memorandums of Understanding (MOU) with external agencies that explicitly state agencies may not republish record level identifying information received from OPM.

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

EHRI DW's data is made available to its data providers for view-only access, restricted to data provided by their HR system(s), through the use of its PIV-enforced web site that employs least privilege access through role-based accounts. EHRI DW maintains automated audit log capabilities for its data. Web site requests are logged in the web server logs. Additionally, logs are maintained for EHRI DW's supporting applications installed on servers. All requests for manual data calls are logged. In addition, OPM's Office of Strategy and Innovation (OSI) manages MOU's and internal records for its EHRI DW / SDM data disclosures.

6.5 Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk that the information will be disclosed and used for a purpose that is not consistent with the purposes for which it was originally collected.

Mitigation: This risk is mitigated by provisions in MOUs with participating agencies that require the recipients of the information to use it only for the purpose for which it is provided. Internally this risk is partially mitigated by restricting access to only authorized users who have signed and agreed to OPM rules and behavior guidelines.

Section 7.0. Redress

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

EHRI DW does not provide individual Federal employees with direct access to the system to review or amend their information. Individuals may submit a Privacy Act request for their records by following the process outlined in the OPM-GOVT-1 General Personnel Records SORN.

Current Federal employees should request their records from their current agency; former Federal employees should request their records from OPM. In general, individuals must furnish the following information for their records to be located and identified:

- Full name(s)
- Date of birth
- Social security number
- Last employing agency (including duty station) and approximate date(s) of employment
- Signature

Individuals requesting access must comply with OPM's Privacy Act regulations on verification of identity and access to records (5 CFR part 297).

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

EHRI DW does not provide individual Federal employees with direct access to the system to review or amend their information. Current Federal employees wishing to request amendment of their personnel records should contact the

appropriate office at their current agency. Once the agency updates the information, the corrected information is transmitted to OPM and the EHRI DW data is updated. Former employees should contact the Office of Personnel Management. Individuals must furnish the following information for their records to be located and identified:

- Full name(s)
- Date of birth
- Social security number
- Last employing agency (including duty station) and approximate date(s) of employment
- Signature

Individuals requesting amendment of their records must comply with OPM's Privacy Act regulations on verification of identity and access to records (5 CFR part 297).

7.3 How does the project notify individuals about the procedures for correcting their information?
The OPM GOVT-1 General Personnel Records SORN and this PIA provide notice regarding access and amendment of records to individuals, as does OPM's regulation at 5 CFR 297. In addition, each agency may communicate to its employees about procedures to correct information to employees within their agency. This may include written notifications, emails or phone calls.

7.4 Privacy Impact Analysis: Related to Redress
Privacy Risk: There is a risk that individuals will not be able to access an amend information about them that is contained in EHRI DW.

Mitigation: This risk is mitigated by OPM and individual agencies' providing clear notice and instructions regarding access to and amendment of personnel records through publication of the OPM GOVT-1 SORN, this PIA, and through various agency websites and internal communication with employees.

Section 8.0. Auditing and Accountability
8.1 How does the project ensure that the information is used in accordance with stated practices in the PIA?
OPM requires its employees with access to EHRI DW to review and agree to the system's Rules of Behavior. In addition, OPM establishes written

agreements with all external agencies that have access to EHRI DW records, which describe the purpose for collecting and the appropriate uses of the information. OPM's Office of Strategy and Innovation (OSI) manages MOUs and internal records for its EHRI DW/SDM data disclosures and regularly conducts training with its staff regarding to restrictions on the use and dissemination of the information. Individual agencies with whom information from EHRI DW is shared must require that their employees adhere to their agency's signed agreements and to the routine uses of the records as outlined in the OPM/GOVT-1 system of records notice. In addition, EHRI DW maintains and reviews log files to monitor appropriate usage and limits access for system users to the information that a particular user has a need to know.

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

All OPM employees and contractors who support and access EHRI DW are required to complete OPM's Security and Privacy Awareness Training prior to gaining access and annually in order to maintain their system access. In addition, system users are required to first pass a preliminary background check prior to gaining access to OPM network resources, including EHRI DW.

HR staff from external agencies are required to sign and submit a Rules of Behavior form with their request for access. Once access has been approved and configured, all EHRI DW users must acknowledge acceptance of the EHRI DW Rules of Behavior upon login. The Privacy Notice and Rules of Behavior are made available on the web site for EHRI DW users to view. In addition, OPM's Office of Strategy and Innovation (OSI) conducts regular training with its staff regarding restrictions on use and dissemination of EHRI DW and SDM data.

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

Access to EHRI DW is obtained through an application process that must be approved by the applicant's immediate supervisor who certifies the business need for and the type of required level of access. The application must also be approved by the OPM Data Management Policy staff. Users must consent to the system's Rules of Behavior. EHRI DW's data is made available to its data providers for view-only access, restricted to data provided by their HR system(s), through the use of its PIV-enforced web site for data quality purposes. Agencies having authorized, approved purposes for providing data to or receiving data from EHRI DW are required to sign written

agreements with OPM. The ability to retrieve information from the system is based on the user role within EHRI DW, which determine the scope of data visible to a particular user.

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?

A Federal agency requesting to transmit HR or training information to EHRI DW contacts the OPM Program Office. The Program Office coordinates with EHRI DW's Information Systems Security Officer (ISSO) to document their requirements.

The ISSO prepares the documents for signatures by the external agency HR representative and OPM's EHRI DW Program Manager. Agencies or their data providers who securely transmit data files to OPM are required to review and re-sign an MOU and ISA every 3 years. Internal OPM interconnected systems that receive data from EHRI DW are required to sign an MOU. Agencies external to OPM that receive data from EHRI DW are required to sign an MOU and ISA every 3 years.

Access to the EHRI DW system must requested by a Federal supervisor, who completes, signs, and submits an EHRI DW access form for the employee, providing justification for the business need. In addition, the request must include the user's signed Rules of Behavior form.

OPM's Office of Strategy and Innovation (OSI) meets with agencies seeking EHRI data in support of their mission to determine appropriate authority, scope, and context. Routine data uses are validated prior to signed agreements, after the Group Manager has met with OGC and the Chief Privacy Officer. All of OSI's MOUs are submitted for approvals by appropriate agency personnel.

Responsible Officials

Victor Karcher
Program Director
Federal Data Solutions
Data Warehouse
Office of the Chief Information Officer (OCIO)
U.S. Office of Personnel Management

Approval Signature

Signed copy on file with the Chief Privacy Officer

Kellie Cosgrove Riley
Chief Privacy Officer
Office of Personnel Management