Privacy Impact Assessment for

eOPF Scanning Facility

April 30, 2020

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Abstract

The eOPF Scanning Facility creates the official digital imaged version of the Official Personnel Folders for Federal employees, and various work folders used by Federal agencies' human resource offices. It also creates digital imaged records for non-Federal employees managed by Federal agencies. This privacy impact assessment is being conducted because the scanning system contains sensitive personally identifiable information about individuals.

Overview

The eOPF Scanning Facility is operated by an OPM contractor and creates the official digital imaged version of the Official Personnel Folders (OPF) for Federal employees, and various work folders used by Human Resource offices. It also creates digital imaged records for non-Federal employees managed by Federal agencies. Each Federal employee has a single personnel folder, known as the OPF, which documents the entire period of Federal civilian service. OPM maintains and operates the electronic OPF (eOPF) system that contains digital images of the paper OPF for Federal employees, virtual work folders for use by human resource (HR) offices, and folders for non-Federal employees at certain agencies. The eOPF folders are the electronic equivalent of the employee's paper OPF documents.

The e-GOV initiative of the President's Management Agenda initiated in July 2001 challenged the Federal government to automate. The Office of Management and Budget (OMB) was charged with the implementation to reduce the amount of paper used by automating business processes. OPM, working with OMB, advised agencies that they had to convert the OPFs of their employees to an electronic format. eOPF is the solution that OPM chose for the Federal government. The eOPF system is addressed in a separate PIA available at opm.gov/privacy. The eOPF Scanning Facility is the solution OPM has implemented to convert paper OPFs to electronic format and move them to the eOPF system.

Federal agencies ship their hard copy official personnel records to the eOPF Scanning Facility where the vendor scans, indexes, and securely transmits the documents to OPM's eOPF system in electronic PDF format. The vendor uses a secure manifesting and tracking application which is designed to communicate conversion information to the agency. Authorized agency users are provided with accounts to access the application via a secure website.

Using the vendors secure manifesting and tracking application, an agency can manifest and track all of the records it sends to the eOPF Scanning Facility. The agency makes a record entry of all of the records it sends to the vendor, the vendor's system tracks the records by Social Security number, and the agency is able to print tracking-capable labels that provide tracking information for all the records being sent to the eOPF Scanning Facility.

The vendor produces summary reports every day and posts them to the secure website. These production reports are available only to the relevant agency and contain information identifying the number of OPFs that the vendor received from the agency, scanned, and delivered to the eOPF system.

If the agency requires immediate access to OPFs after they are shipped to the OPF Scanning Facility but before they are available in the eOPF system, it may request that individual OPFs be posted to the secure manifesting and tracking application at the vendor website, where the agency can view and print the records as needed.

The scanned versions of the files are temporarily cached within the vendor system so that once the paper files for a particular agency are converted, each file can be reconciled to ensure 100% accountability for the paper files delivered to the eOPF Scanning Facility, scanned, and transmitted securely to the eOPF system. Once reconciled, the cached electronic files are deleted from the vendor's system. The length of time the records are cached will vary according to the agency project plan prescribed by OPM. Once scanned, the paper documents are transferred either to the National Personnel Records Center or back to the agency.

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?

5 CFR 293.302 established the OPF to hold paper records used by Federal government HR offices. These records establish an employment history that includes grades, occupations and pay, and records choices under Federal benefits programs and were originally maintained as paper records in agency human resources offices. The eOPF Scanning Facility is the solution OPM has implemented to convert paper OPFs to electronic format and move them to the eOPF system as part of an e-Government initiative established in response to the e-Government Act of 2002.

In general, OPM collects and maintains personnel records pursuant to 5 U.S.C. §§ 1104, 1302, 2951, 3301, and 4315; E.O. 12107 (December 28, 1978), 3 CFR 1954-1958 Comp.; 5 U.S.C. 1104, and 1302; 5 CFR 7.2; Executive Orders 9830 and 12107; 3 CFR 1943-1948 Comp.; and 5 U.S.C. 2951(2) and 3301.

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

General Personnel Records; OPM/GOVT 2, Employee Performance File System; and, OPM/GOVT 3, Records of Adverse Actions, Performance Based Reduction in Grade and Removal Actions, and Termination of Probationers SORNs apply to the information maintained in eOPF about Federal employees. The USDA/FSA 6, County Personnel Records, and USDA/OP-1, Personnel and Payroll System SORNs apply to the information maintained on non-Federal county employees for USDA.

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

1.4. Does a records retention schedule approved by the National Archives and Records Administration (NARA) exist?
Yes. The cached scanned documents in the vendor system and the hard copy OPFs that the agencies send to the eOPF Scanning Facility are covered by GRS 5.2, Transitory and Intermediary Records, item 020.

The NARA approved schedule for the OPF and eOPF is General Records Schedule (GRS) 2.2: Employee Management Records.

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 majority of records submitted to and scanned by the eOPF Scanning Facility are forms that are completed by Federal employees both before and after they enter Federal service. Some of the forms are subject to the PRA because they constitute collections of information from the public and others are not. A master list of forms that may be submitted for scanning is available at www.opm.gov/policy-data-oversight/data-analysis-documentation/enterprise-human-resources-integration/MasterFormsList/Permanent/index.aspx. In addition to the forms on the master list, agencies may also have agency-specific forms that they include in their personnel files and may be submitted to the vendor for scanning. For a complete listing of an agency's specific forms list, contact the eOPF Program Management Office (PMO) at eOPFOversightManagers@opm.gov.

Section 2.0. Characterization of the Information

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

The eOPF Scanning Facility collects, uses, disseminates, or maintains records obtained from Federal agencies that are included in an employee's official personnel folder (OPF). Those records may contain the employee's full name, date of birth (DOB), Social Security number (SSN), mailing address, home address, email address, telephone numbers, military service ID number, health and/or life insurance policy numbers, SSN of family members, DOB of family members, address of family members, bank account number, certificate/license number, education record and other identifying information. In addition these records may contain information about past and present positions held; grades; salaries; duty station locations; notices of all personnel actions, such as appointments, transfers, reassignments, details, promotions, demotions, reductions-in-force, resignations, separations, suspensions, OPM approval of disability retirement applications, retirement, and removals; work experience; education level; specialized education or training obtained outside of Federal service; agency specific forms; and other documents relating to the recruitment, service history, payroll, benefits, retirement, performance and security clearance of an employee.

For members of the Senior Executive Service, the records may include information relating to sabbatical leave programs, reassignments, and details.

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

Federal agencies submit personnel records to the eOPF Scanning Facility so that the records can be scanned and transmitted to OPM's eOPF system. The paper documents may be shipped directly to the vendor by the agency or the agency may opt to have the vendor manage the shipping via a licensed and bonded commercial carrier.

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

No. The eOPF Scanning Facility does not use information from commercial sources or any publicly available data.

2.4. Discuss how accuracy of the data is ensured.

The eOPF Scanning Facility vendor and OPM personnel conduct a quality assurance review of the scanned documents to determine whether the scanned document image matches the paper form that was scanned. The vendor's quality control review team compares indexing data, image, and overall conversion quality by performing a folder-to-image review of all agency folders. When the vendor transmits the scanned documents to the eOPF system, it reconciles the number of records sent to eOPF with the number of records received by eOPF. Any discrepancies are addressed. This process is repeated until OPM and the vendor determine that the records at the vendor match those in the eOPF system.

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

Privacy Risk: There is a risk that the scanned version of the documents submitted to the eOPF system by the eOPF Scanning Facility will not be an accurate representation of the paper record.

Mitigation: This risk is mitigated through the quality assurance process implemented by the vendor and OPM, described above.

Privacy Risk: There is a risk that agencies will submit and the eOPF Scanning Facility will scan and submit to the eOPF system records that are not properly included in an employee's official personnel folder.

Mitigation: This risk is mitigated by the vendor's indexing process, whereby forms that are not included on the Master Forms List or the Agency Forms List are flagged, reviewed, and either approved to move forward for scanning if they are deemed appropriate or returned to the submitting agency.

Section 3.0. Uses of the Information

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

The paper documents that are submitted to the eOPF Scanning Facility are scanned by the vendor and the scans are submitted to OPM's eOPF system. The sole purpose of the eOPF Scanning Facility is to convert the paper OPF documents into an electronic format for transmission and eventual use within the eOPF system. The vendor uses employees' SSNs to track an agency's records within the scanning process and, in combination with the employee's full name and date of birth, to validate within the eOPF system that the scanned documents are filed correctly. Ultimately, this facilitates the establishment in the eOPF system, for every Federal employee, a dedicated, easily viewable electronic personnel folder to which they have immediate access and notification of changes to their files in a secure environment.

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.

No, the eOPF Scanning Facility does not use technology to conduct electronic searches, queries, or analysis to discover or locate a predictive pattern or an anomaly.

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

Only the vendor, OPM's eOPF program staff, and authorized Federal agency personnel have access to the vendor's secure web portal. There are no other programs or offices with assigned roles or responsibilities within the system. The system is only designed to scan information and then transfer it to eOPF.

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

Privacy Risk: There is a risk that unauthorized users may access the information in the scanning system and use it for purposes that are inconsistent with the purposes for which it was collected or that authorized users may use the information for an unauthorized purpose.

Mitigation: This risk is mitigated through the use of role-based access controls in a secure web portal, which only permits authorized individuals from the vendor, eOPF program management office, and the Federal agencies who submit records to the vendor to access information in the vendor's system, and through the vendor contract, which identifies the vendor’s responsibility with respect to the records in its possession. In addition, OPM requires all vendor personnel who support the eOPF Scanning facility to sign a non-disclosure agreement. Vendor personnel also receive a Public Trust background investigation, computer security training, and 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.

The eOPF Scanning Facility does not collect information from individuals or otherwise interact with them and, therefore, does not provide them with notice. More generally, individuals receive notice in the form or Privacy Act statements on the forms they complete concerning why their information is being collected and how it will be used. They receive notice of the eOPF Scanning Facility via publication of this PIA.

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

The eOPF Scanning Facility does not collect information from individuals or otherwise interact with them and individuals do not have the ability to consent to having their records scanned by the vendor

4.3. Privacy Impact Analysis: Related to Notice

Privacy Risk: There is a risk that individuals may not be aware that their information will be sent to the eOPF Scanning Facility and then on to the eOPF system.

Mitigation: This risk is mitigated through the publication of this PIA, which is adequate notice given the limited function and purpose of the eOPF Scanning Facility. Individuals are provided appropriate notice at the point of collection of their information regarding the use of their information more generally and are also provided as appropriate with the opportunity to decline to provide information or otherwise consent to its use.

Section 5.0. Data Retention by the Project

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

The cached scanned documents in the vendor system and the hard copy OPFs that the agencies send to the eOPF Scanning Facility are covered by GRS 5.2, Transitory and Intermediary Records, item 020. The scanned documents in the vendor cache are deleted after the vendor and OPM have conducted a full reconciliation of the paper and scanning results, a quality assurance review to determine that the scans are accurate depictions of the paper records and have been accurately transmitted to the eOPF system. The paper records, however, are currently not destroyed after the quality assurance review. They are temporarily stored at the vendor facility pending shipment to either the National Personnel Records Center or returned to the relevant agency for final disposition. The NARA approved schedule for the

OPF and eOPF is General Records Schedule (GRS) 2.2: Employee Management Records.

5.2. Privacy Impact Analysis: Related to Retention

Privacy Risk: There is a risk that the information in the scanned documents in the vendor's cache and/or the hard copy documents that the agencies send to the vendor will be retained longer than is permitted to meet the intended business purpose.

Mitigation: This risk as it pertains to the vendor cache is mitigated by requiring the vendor to adhere to the applicable records schedule and destroy the documents once they are no longer needed. The risk as it pertains to the hard copy records appears to currently not be mitigated as the hard copies are sent to the National Personnel Records Center or back to the agencies. The eOPF program will examine this potential risk in more detail through consultation with the OPM Records Officer and determine whether process changes are required

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, but the information is available only to the vendor, OPM eOPF program personnel, and the relevant Federal agency personnel responsible for submitting their hard copy records to the vendor for scanning.

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

The eOPF Scanning Facility vendor's access to the hard copy and scanned personnel records is permitted by routine use "j" in the OPM GOVT-1 SORN: "To disclose information to contractors, grantees, or volunteers performing or working on a contract, service, grant, cooperative agreement, or job for the Federal Government."

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

Individual agencies are governed in their use and dissemination of their personnel records by the OPM GOVT-1 SORN. The contract between OPM and the vendor contains relevant information concerning the appropriate handling and use of the records in the vendor's possession.

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

The eOPF Scanning Facility vendor's tracking and manifesting system logs every action performed against each document from the time the documents leave the agency, through the scanning operation, and then when the PDFs are sent to the eOPF system and the hard copies are sent back to the agency or to the National Personnel Records Center. The system produces a digital receipt of transactions by maintaining tracking logs for all documents. These electronic records identify the entire chain of custody for each document through the manifesting and tracking application system during the lifecycle of the scanning process.

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 through various controls including use of the vendor's tracking and manifesting system for document manifesting, shipping of sealed boxes, secure storage at vendor facility, and agency access to a secure web portal requiring appropriate authentication, all governed by various OPM clauses and requirements in the PWS.

Section 7.0. Redress

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

Individual Federal employees have no direct access to the records at the eOPF Scanning. Federal employees access the eOPF using a login ID and password or Personal Identity Verification (PIV) card credentials issued by their agency. When an employee logs into eOPF, he or she has read only access to his or her individual folder.

In addition, individuals can submit a Privacy Act request for their records by following the process outlined in the applicable SORNs listed in 1.2. Individuals requesting access must comply with OPM's Privacy Act regulations on verification of identity and access to records (5 CFR part 297).

Current Federal employees should contact the Personnel Officer or other responsible official of their agency. Former Federal employees should contact the National Personnel Records Center (Civilian), 111 Winnebago Street, St. Louis, Missouri 63118. In general, individuals must furnish their Full name, Date of birth, Social Security number, Last employing agency (including duty station), approximate date(s) of employment (for former Federal employees), and their signature.

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

Individuals do not have direct access to the eOPF Scanning Facility to correct their information. However, individuals can request amendment of their records by following the process outlined in the applicable SORNs listed in 1.2. Individuals must comply with OPM's Privacy Act regulations on verification of identity and access to records (5 CFR part 297). Current Federal employees should contact the Personnel Officer or other responsible official of their agency. Former Federal employees should contact the National Personnel Records Center (Civilian), 111 Winnebago Street, St.

Louis, Missouri 63118. In general, individuals must furnish their Full name, Date of birth, Social security number, Last employing agency (including duty station), approximate date(s) of employment (for former Federal employees), and their signature.

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

Individuals cannot access and amend their records through the eOPF Scanning Facility and, therefore, it does not provide individuals with notice. However, individuals are notified concerning the general process to access and amend their records in the relevant SORNs, this PIA, and via notifications from the eOPF system via email notifications that are sent to employees when the scanned documents are added to their eOPF folders and which instruct employees to review the new document(s) and notify their human resources office of any inaccurate information.

7.4. Privacy Impact Analysis: Related to Redress

Privacy Risk: There is a risk that individuals will not have the ability to access and amend records that the eOPF Scanning Facility holds.

Mitigation: This risk is mitigated because although there is no ability to access and amend records at the eOPF Scanning Facility there are clear processes in place for individuals to do so by contacting OPM or their employing agency.

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?

Within the eOPF Scanning Facility’s manifesting and tracking application , audit logs of user access to the system and to the area where the hard copy records are held   are maintained. These audit logs may be reviewed to determine appropriate handling and access to the records. In addition, role-based access controls are in place that limit individuals to only that which is necessary for them to perform their duties. All scanning facility user access and accounts are maintained in accordance with the Scanning Facility Role-Based Access Control Matrix that determines what system objects users have access to. All user accounts and assigned roles regardless of privilege level are approved by scanning facility management.

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

The vendor staff and all eOPF program management staff complete annual security awareness training whick specifically addresses the importance of protecting PII.

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

The eOPF Scanning Facility system users are assigned roles by the vendor management and all user accounts must be approved by management prior to creation or modification by administrators. This process also applies to the issuance of electronic badging that is required to gain physical access to the secure production area.

The only users outside of scanning facility personnel that have limited access to the system are personnel individually designated by the agency whose records are being converted and authorized members of the OPM program management office that works with agency personnel to perform quality assurance checks and reconcile the list of paper files received with the list of electronic and paper files processed and returned to the agency. Designated agency personnel have limited access via a secure web service interface to provide manifest lists of agency files to be processed to scanning facility, request priority scanning, and a very limited ability to view-only in PDF format specific files requested by that agency.

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?

The eOPF Scanning Facility is operated pursuant to an OPM contract. There are currently no MOUs pertaining to the eOPF Scanning Facility and no contemplated new uses of or access to the information. Any relevant changes will be reviewed and approved by the appropriate OPM stakeholders.

Responsible Officials

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Approval Signature

Signed copy on file with the Chief Privacy Officer.

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