Privacy Impact Assessment for

# Open Opportunities

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## Abstract

Open Opportunities is a United States Office of Personnel Management (OPM) website, as well as a government-wide program offering professional development opportunities to current federal employees and internships to students. The system is housed within OPM's Human Resources Solutions (HRS) organization and is supported by a federal infrastructure and federal employees. The system offers an easy way for agencies, departments, and other areas of the Federal Government to connect the federal workforce, learn what other areas of the government are doing, and share best practices. It allows the workforce to gain interagency insights and points of contact and taps into the talent and expertise that's often buried in agency silos. Primarily, the system allows Federal Government agencies to meet their mission, while offering professional development to fellow federal employees. This Privacy Impact Assessment is conducted because Open Opportunities collects, maintains and disseminates personally identifiable information about federal employees and members of the public who are seeking internship opportunities with the Federal Government.

## Overview

Open Opportunities is a United States Office of Personnel Management (OPM) website, as well as a government-wide program through which federal agencies offer professional development opportunities to current federal employees and internships to students. It is housed within OPM's Human Resources Solutions (HRS) organization and is supported by a federal infrastructure and federal employees. Through Open Opportunities, current federal employees or students looking for internships with the Federal Government, can apply to participate in short-terms projects to develop and/or enhance their skills sets, network with others, and advance their professional development. Agencies can post announcements for opportunities on the Open Opportunities website when they have a short term need that might be outside of the skillset of their current staff. Federal employees and student can then search and apply for these opportunities, which are designed to help them build on their current skills or gain new

skills to continue to advance their careers. Through this process, both agencies and applicants benefit from sharing and developing knowledge and making new contacts in the federal community. The system empowers collaboration outside traditional management hierarchy and agency boundaries, while encouraging knowledge sharing.

Federal agencies that want to post opportunities on the Open Opportunities website must first create a profile in USAJOBS, a Federal Career Portal website that is housed within HRS. The profile includes their agency name and a confirmed Federal email address for the relevant point of contact. That information is then shared with Open Opportunities. In Open Opportunities, the agency POC posting the opportunity provides as much information as possible about the opportunity and will then select a target audience, or community if they want to post the opportunity to a specific community. A community is a group of Open Opportunity users who may belong to different agencies but share a common goal or interest. A community can be created as an open or closed community. If a community is open, any logged in user can create an opportunity for the community and anyone in the appropriate target audience (federal employee or student) can apply. If the community is closed, a user must be a member of the community to create an opportunity, however any logged in user with the correct target audience can apply. To become a member of a closed community, users currently reach out to the administrator of the community to request to join. The Open Opportunities program administrators or community managers review the opportunity after it is submitted and then either email the submitter when the opportunity is approved and goes live or seek corrective action if there is a need to make changes.

To apply for an opportunity, current federal employees and students must have or create a profile in USAJOBS. Individuals complete and submit their profile information to USAJOBS using any modern internet browser. Open Opportunities uses information from individuals USAJOBS profiles to include name, agency, confirmed federal email address, and location. In the future, federal employees will also be able to select a resume from USAJOBS to attach to some applications. Students will be able to select a transcript from USAJOBS and profile data related to their work experience and education for their applications.

They can then find opportunities on the home page or by using the search icon to search for opportunities by status, skill, career field, series, time commitment and more. If interested in an opportunity, the applicant will select the Apply button to state their interest. At that point, a small subset of their USAJOBS profile information will be provided to Open Opportunities and the person who posted the opportunity will review the applicant's information and reach out to them through the email address in the profile.

# 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?**

The legal authorities that authorize the system to collect and disseminate applicant information to support the recruitment and hiring process include 5 U.S.C. § 3327 (Civil Service Employment Information), 5 U.S.C. § 3330, (Government-wide List of Vacant Positions), 5 C.F.R. § 410.203 (Options for developing employees), and Executive Order 13162 "Federal Career Intern Program" (July 6, 2000).

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

The SORN applicable to the information in Open Opportunities is OPM GOVT-5 Recruiting, Examining, and Placement Records.

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

Yes, a system security plan was completed by the Office of the Chief Security Office as part of the package for the Authorization to Operate (ATO).

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

No. The Open Opportunities program is working with OPM's Records Officer to develop an appropriate records schedule. Until the records schedule is developed and approved by NARA, the records in the system will be treated as permanent, pursuant to NARA requirements.

**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 collection of information on the USAJOBS platform is covered by OMB Control Number 3206-0219. Limited additional information is collected on the Open Opportunities platform, but only from federal employees and thus not subject to PRA requirements. To the extent additional information will be collected from members of the public (i.e., students applying for internships), the program will seek any necessary PRA approval.

# Section 2.0. Characterization of the Information

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

Open Opportunities collects, uses, disseminates, or maintains the following information about those individuals who apply for opportunities or internships: name, email address, geographic location, current agency name (for federal employees), biography (if supplied), and whether the individual is a current federal employee or student. In addition, for federal employees, Open Opportunities collects, uses, disseminates, or maintains a list of an individual's skills. Furthermore, for students applying for internships, Open Opportunities also collects, uses, disseminates, or maintains work experience, references, education, transcript, and languages.

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

Information is collected directly from the individual via the USAJOBS online interface when the individual creates a USAJOBS profile using any internet browser. After individuals apply for an opportunity on the Open Opportunity website, their information is made available to the agency POC who created the opportunity. When the opportunity creator clicks on the view link beside an applicant's name, the applicant summary page displays with a view of limited applicant data as entered in USAJOBS to include the applicant's name, agency, location, federal email address, and biography (if supplied).

Any skills entered by the applicant in Open Opportunities will also be available for the creator to view.

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

This system does not use any commercial or publicly available data.

## 2.4. Discuss how accuracy of the data is ensured.

Open Opportunities does not independently verify the information provided by individual applicants.  When individuals provide information at the USAJOBS website, a combination of field restrictions and user confirmation prompts are used to make sure individuals provide accurate information. Field restriction allows individuals to only enter data that has, for example, a certain number of characters or a specific format. User confirmation prompts are used to ask individuals to validate that the data that they have entered is accurate, before permitting them to proceed. In addition, Open Opportunities is designed so that only the applicant data for the correct applicant is displayed to an opportunity creator. Open Opportunities receives a unique identifier from USAJOBS that only allows the creator to view the information for the specific applicant only.  This is handled by the authentication between login.gov, USAJOBS, and Open Opportunities.

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

**Privacy Risk**: There is a risk of collecting inaccurate information about individuals that may result in unfavorable hiring decisions.

**Mitigation:** This risk is mitigated at the point of collection from the individual through the use of field restrictions that permit individuals to enter data only within certain parameters and through the use of user confirmation, in which USAJOBS asks individuals to validate that the information submitted is accurate. Generally, opportunity seekers have an interest in ensuring that the information they provide is accurate; Open Opportunities does not otherwise validate the information that is collected from the user. However, Open Opportunities does verify that only the applicant data for the correct applicant is displayed to an opportunity creator. This is handled by the authentication between login.gov, USAJOBS,

and Open Opportunities as well as through a unique identifier passed from USAJOBS to Open Opportunities.

**Privacy Risk**: There is a risk that more information than is necessary to achieve the business purpose will be collected.

**Mitigation**: This risk is minimized because Open Opportunities is designed to only collect very specific and limited information from USAJOBS.  As discussed above, only the applicant's name, location, agency, validated federal email address and biography (optional field) collected from USAJOBS will display in Open Opportunities as well as any skills the applicant has self-selected in Open Opportunities.

# Section 3.0. Uses of the Information

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

Open Opportunities uses the information about individuals that it obtains from USAJOBS to confirm that the individual is a federal employee or student and, as such, is eligible to apply for open opportunities.  The agencies who have created the opportunities use the information about the individuals to determine whether they are qualified for the opportunity and to contact the individuals.

### 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.

Open Opportunities has a search feature through which individuals can query to find relevant opportunities.  The system itself does not conduct any searches, queries, or analysis to locate predictive patterns or anomalies.

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

Within HRS, the USAJOBS program interacts with Open Opportunities, providing individuals the ability to create profiles and providing Open Opportunities with specified data elements from those profiles.

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

**Privacy Risk**: There is a risk that unauthorized individuals may access the information in the system and use it for an unauthorized purpose.

**Mitigation:**  This risk is mitigated because Open Opportunities does not allow the viewing of any individual's profile data without being authenticated (logged in). Any attempts to view profile data by an unauthenticated user or session is denied.

**Privacy Risk**: There is risk that the information about individuals in the system will be used outside of the scope of the purpose for which the initial collection was made.

**Mitigation**: This risk is mitigated by providing access only to authorized and registered users of Open Opportunities. Users of Open Opportunities are informed of appropriate uses of the information in the system upon authorization to the system and all those responsible for administering and operating the system are also trained on the appropriate use information in the system.

# 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 Open Opportunities website, and the USAJOBS website where the initial collection of information from the individual is collected, provide notice about the collection and use of information through  a System Use Notification, Privacy Policy, Full Terms and Conditions of Use, and Rules of Behavior which are presented through links available to every user on USAJOBS and Open Opportunities. Individuals are also provided with a link to a USAJOBS Privacy Act Statement located on the header of the registration and authenticated pages.

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

Creating a USAJOBS profile and applying for openings on the Open Opportunities website are voluntary.  Once an individual applies to an open

opportunity, they do not have the ability to consent to some uses of their information and not others.

### 4.3. Privacy Impact Analysis: Related to Notice
**Privacy Risk:** There is risk that individuals will not receive adequate notice concerning why their information is being collected and how it will be used.

**Mitigation:** This risk is mitigated by providing relevant notice at both the USAJOBS and Open Opportunities websites through mitigates this risk by providing individuals with System Use Notification, Privacy Policy, Full Terms and Conditions of Use, and Rules of Behavior prior to their providing any personal information.

## Section 5.0. Data Retention by the Project
### 5.1. Explain how long and for what reason the information is retained.
The records in Open Opportunities are currently unscheduled and as such must not be destroyed or deleted.  The Program Office is working with the OPM's Records Officer to schedule the records and obtain NARA approval.

### 5.2. Privacy Impact Analysis: Related to Retention
**Privacy Risk:** There is a risk that information about individuals will be stored for longer than necessary to fulfill the business need for the information.

**Mitigation:** This risk is currently not mitigated because the program does not have an approved NARA-approved records retention schedule and, therefore, the records must be retained as permanent.  The program will seek to mitigate this risk by working with OPM's Records Officer to schedule the records and obtain NARA approval.

# 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.

Applicant information is available to agency opportunity creators that are logged onto the system so that they may view the information related to their applicants.

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

Open Opportunities and USAJOBS provide access to applicant information to appropriate agency users consistent with the  outlined in the OPM GOVT 5 SORN, which states that the records in that Privacy Act system of records "are used to refer candidates to federal agencies for employment consideration, including appointment, transfer, reinstatement, reassignment, or promotion" and permissible pursuant to routine use "a."

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

All subscribing agencies are subject to the OPM GOVT-5 SORN and may not re-disseminate information inconsistent with the purpose and routine uses in that SORN. In addition, agency users are subject to the Rules of Behavior that outline appropriate handling and use of USAJOBS and Open Opportunities' information.  The Rules of Behavior state the information will only be disclosed in connection with the performance of official duties solely for authorized purposes and will only be disclosed to other agencies or persons expressly authorized to receive or have access to it.

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

Records of requests for and disclosure of information are tracked through vendor-help@usajobs.gov, processed by the data analytics team and stored in a help desk tracking commercial-off the shelf (COTS) tool.  Access to the system and the information it contains are tracked through system audit logs that can be reviewed to determine who is accessing the site and what information they have viewed or accessed.

**6.5. Privacy Impact Analysis: Related to Information Sharing**

**Privacy Risk**: There is risk that the information will be provided outside of the Open Opportunities program for a purpose that is not consistent with the stated purposes of the program.

**Mitigation**: This risk is mitigated by requiring that system users adhere to rules of behavior, which are reviewed and signed annually. This provides notice that unauthorized access and use of information for unauthorized use, or otherwise misuses of the system are strictly prohibited. Such attempts or acts are subject to action that may result in criminal, civil, or administrative penalties.

# Section 7.0. Redress

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

Individuals have access to their information by creating an account through login.gov.  They can then obtain access with their username, password, and a logo.gov provided session PIN code. To access Open Opportunities, users must also create a profile on basic profile on USAJOBS.   In addition to this direct access, individuals can request access to their information by following the instructions in the OPM GOVT-5 SORN.

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

Individuals may correct their information in USAJOBS at any time by logging into USAJOBS with their login.gov credentials and making changes to their profile. The USAJOBS Help Desk can also respond to applicant requests related to erroneous or inaccurate information and refers those applicants to the appropriate agency representative. In addition, individuals can request amendment of their information by following the instructions in the OPM GOVT-5 SORN.

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

Notification is provided at the USAJOBS website, through the USAJOBS Help Center, which can assist individuals regarding accessing and amending their information, and through this PIA and the OPM GOVT 5 SORN.

### 7.4. Privacy Impact Analysis: Related to Redress

**Privacy Risk**: There is a risk that individuals will not have access to or the ability to amend their records, potentially resulting in inaccurate decisions that impact their success in being selected for an opportunity or the agency's ability to select the most qualified candidate.

**Mitigation:** This risk is mitigated by providing individuals with direct access to their information in USAJOBS and the ability to amend that information.

## Section 8.0. Auditing and Accountability

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

Open Opportunities captures enough information in audit records to establish what events occurred, the sources of the events, and the outcomes of the events. USAJOBS personnel review and analyze application audit records for indications of inappropriate or unusual activity, investigate suspicious activity or suspected violations, report findings to appropriate officials, and take necessary actions.

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

All OPM employees are required to take annual Security and Privacy Awareness Training. Additionally, administrative access to the systems is limited to individuals within the OPM program office and development staff only. These individuals are required to take OPM IT administrator security training annually. Furthermore, every agency user is required to accept the systems Rules of Behavior which requires that they take the annual security and privacy training at their home agency.

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

System access to Open Opportunities is provided on an annual basis. Only authorized users may obtain privileged access to Open Opportunities. Privileged access is limited to individuals in the Open Opportunities program office or development team who require elevated privileges for system operations. The customer organization is prohibited from assigning rights or delegating access to the system to persons not authorized and assumes all responsibility for the licensed users it provides access. Contractors are allowed to use Open Opportunities at their customer agency's discretion.

Federal IT Security requirements restrict access to Open Opportunities through a dual-authentication process.

## 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?

Access to the information and systems is granted as a part of the IAA and Statement of Service agreement process entered into on an annual basis. Authorized agency personnel and the Program Manager sign a written agreement that contains the privacy and security policies for Open Opportunities and the Rules of Behavior for all information types. This process is followed for organizations within OPM and outside.

## Responsible Officials

Michelle Earley
USAJOBS Program Manager

Rhonda Wood
HRS IT Program Manager

## Approval Signature

*Signed copy on file with the Chief Privacy Officer*

Kellie Cosgrove Riley
Chief Privacy Officer