



Privacy Impact Assessment for
Enterprise Human Resources Integration (EHRI)

October 20, 2025

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Abstract

The Enterprise Human Resources Integration (EHRI) 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 collects, maintains, disseminates, and uses personally identifiable information.

Overview

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 from a wide range of federal sources enables that mission.

EHRI 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 OPM's Azure cloud EHRI system.

EHRI provides workforce analytics and planning capabilities to improve human capital management across the federal employee base. EHRI data is made available to OPM internal users through OPM's Azure Databricks environment. External access to data is provided through the public FedScope website (fedscope.opm.gov) which will soon be replaced by the Federal Workforce Data website (data.opm.gov). OPM also produces data quality reports to assist agencies and providers with identifying data errors and inconsistencies with Federal regulations.

Through this data access, users have access to workforce planning, analysis and forecasting tools to meet the Federal workforce planning requirements. EHRI 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 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 System Security Plan was signed on March 6, 2025.

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 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 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.

A full explanation of information captured in EHRI 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 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 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 as files containing employee status, HR dynamics actions, payroll, and training data.



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

2.4 Discuss how accuracy of the data is ensured.

The accuracy of the information provided to EHRI is the responsibility of all reporting Federal agencies. EHRI 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. Information in EHRI 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'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 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 purpose 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, through the GHRR and GRDR.



Privacy Risk: There is a risk that the information in EHRI 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, which validates the submissions against published guides for reporting, data standards, and personnel file edits.

Section 3.0. Uses of the Information

3.1 Describe how and why the project uses the information.

EHRI 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 provides workforce analytic and planning capabilities to improve human capital management across the federal employee base.

The information in EHRI 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 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 also helps determine projected deficiencies by occupation, grade, organizations units, or geographic location.

The information in EHRI 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 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.

No. The data in EHRI provides workforce analytics and planning capabilities to improve human capital management across the federal government. The data is accessed by statistical analysis and business intelligence tools to aid in understanding the Federal workforce but it is not performing anomaly detection or using AI.

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

All roles and responsibilities for developing, maintaining, and supporting EHRI are within the Office of the Chief Information Officer and Human Resources Solutions.

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. EHRI does not collect information directly from individuals nor do individuals have direct access to EHRI. While individuals do not receive notice that their information will be collected and used in EHRI specifically, they are provided with notice concerning the collection and use of their information at the original point of collection through Privacy Act statements. 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. 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 and that they may not understand how their information is being used.

Mitigation: This risk cannot be mitigated using the system, as EHRI 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 may disclose to their employees that their individual HR systems data is transmitted to OPM to support EHRI.

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 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 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'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, 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 data providers, including staff in the agencies they represent, have access to their agency information via authenticated Power BI reports in OPM's Azure environment. This access is view-only and is restricted to information that each agency or provider is responsible for submitting to EHRI. 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.

OPM shares information from EHRI with external agencies in accordance with the data release policy and as outlined in written agreements between the agencies and OPM. OPM also shares EHRI data externally in support of FOIA requests or other general inquiries from external entities. The data release policy can be found here: <https://www.opm.gov/policy-data-oversight/data-analysis-documentation/data-policy-guidance/data-standards/data-release-policy-december-2024.pdf>

OPM also provides public access to some EHRI data through the FedScope 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. The FedScope site will soon be replaced by the Federal Workforce Data site (data.opm.gov) that will serve the same purpose using a more modern architecture.

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

EHRI'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 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 information by Federal agencies, but agencies' use and disclosure of the information is subject to the Privacy Act and by OPM GOVT-1 General Personnel Records SORN. Under certain circumstances, external disclosures of information to third parties (apart from Federal agencies) are governed by a signed written agreement outlining the terms of use and limiting onward dissemination of the information. In other instances, OPM requires Memorandums of Understanding (MOU) with receiving parties that explicitly restrict the republishing of record level identifying information received from OPM.

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

OPM maintains automated audit log capabilities for its data. Web site requests are logged in the web server logs. All requests for manual data calls are logged whether the data contains PII or not. In addition, OPM manages MOU's and internal records for its EHRI 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 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 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 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.

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 to review and agree to the system's Rules of



Behavior. In addition, OPM generally establishes written agreements with Federal agencies that have access to EHRI records, which describe the purpose for collecting and the appropriate uses of the information. OPM manages MOUs and internal records of its EHRI/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 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 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 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.

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 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. The ability to retrieve information from the system is based on the user role within EHRI, 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 contacts the OPM Program Office. The Program Office coordinates with EHRI'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 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 are required to sign an MOU. Agencies external to OPM that receive data from EHRI are required to sign an MOU and ISA every 3 years.

Access to the EHRI system must be requested by a Federal supervisor, who completes, signs, and submits an EHRI 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 meets with agencies seeking EHRI data in support of their mission to determine appropriate authority, scope, and uses. OPM's MOUs are reviewed and cleared by appropriate agency personnel before execution.

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