



Privacy Impact Assessment for
Employee Express (EEX)

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Abstract

Employee Express (EEX) is a system maintained and hosted by OPM Human Resources Solutions Information Technology Program Management Office. EEX is owned by the EEX User Board, a consortium of participating agencies. EEX allows Federal employees and annuitants to view and make changes to their payroll and associated personnel records. This Privacy Impact Assessment is being conducted because EEX collects, maintains, and uses personally identifiable information.

Overview

Employee Express (EEX) is a self-service system that allows participating agency employees and annuitants to view and make changes to their payroll and associated personnel records in one convenient location. EEX serves as a front-end system for the participating agencies' personnel and payroll systems. EEX provides Federal employees and annuitants direct control over their information and eliminates the need to fill out, submit, and process paper forms. Currently, several agencies provide their employees access to EEX; the U.S. Department of State Foreign Service Annuitants are the only annuitants with access to the system.

EEX is maintained and hosted by the Office of Personnel Management (OPM) but is owned by the EEX User Board, a consortium of Federal participating agencies. The agencies send payroll information to their designated payroll provider and instruct the payroll provider to send the information to the EEX master data file. Federal employees and annuitants can then access EEX to view and update their records.

Changes to EEX do not modify the master data file or immediately appear in EEX. Instead, employees and annuitants request changes in EEX, every day EEX sends those changes to the relevant payroll provider who may forward it to the agency, the agency or payroll provider makes the update in their



system, that updates the agency's master data file, and then EEX receives a new agency master data file which shows the updated information.

Each participating agency continues to serve as the system manager of their information and EEX maintains logs of user activity. All user information provided to EEX is owned by the agency providing the data. EEX provides employees and annuitants with several benefits, including a secure Section 508 compliant site for the visually and hearing impaired; immediate access to a one page printable and downloadable Earnings and Leave Statement; and the ability to update such information as home address and tax information. Employees and annuitants may also update the following information in EEX, depending on what options their respective agency has permitted:

- Federal and state taxes
- Direct deposit
- Allotments (Financial, Health Savings, Discretionary)
- Home, Thrift Savings Plan (TSP), and Paycheck mailing address(es)
- Federal Employees Health Benefits (FEHB)
- FEHB Premium Conversion
- TSP and TSP Catch-up Contributions
- Federal Employees Group Life Insurance (FEGLI)
- Disability Indicator
- Employee Emergency Contact Information
- Ethnicity and Race Indicator

In addition, individuals may be able to view, but not change, their Earnings and Leave/Annuity Statements, Online W-2, 1095c, and 1099R.

If an agency allows an employee to update their FEHB or TSP information in EEX, every day, EEX also transmits those requested changes to the Electronic Official Personnel Folder System (eOPF). The eOPF provides a consolidated image and data view that digitally documents the employment actions and history of individuals employed by the federal government.



EEX implements national standards and approved encryption technologies during the entire web-session, while data is stored (at rest) and during the transmission of master data files from participating agencies.

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 information in EEX is collected by the participating agencies pursuant to the general authorities related to hiring and payroll in 5 U.S.C. Part III, Employees. The social security numbers in EEX are collected pursuant to Executive Order 9397 as amended by Executive Order 13478.

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

The information in EEX consists of personnel and payroll information from the various participating agencies. Some of the records in EEX are covered by OPM/GOVT-1, General Personnel Records, while others are covered by a SORN specific to a participating agency.

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

Yes, a System Security Plan was developed for the ATO and is maintained as part of the Continuous Monitoring Requirements.

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

The records in EEX are subject to General Record Schedule 2.4; however, within EEX system they are transitory records subject to General Records Schedule 5.2. The transaction history within EEX is subject to GRS 3.1, Item 20.



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.

EEX is a self-service system that allows participating agency employees and annuitants to view and make changes to their payroll and associated personnel records in one convenient location. Per 5 CFR § 1320.3(c)(4), the "persons" who would be covered by the PRA does not include "current employees of the Federal government (including military reservists and members of the National Guard while on active duty) when acting within the scope of their employment, but it does include retired and other former Federal employees." As the EEX is simply a portal for federal employees to make personnel actions as part of their employee duties, it would not be subject to the PRA.

Section 2.0. Characterization of the Information

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

Participating agencies provide personnel and payroll information to EEX so their employees and annuitants can access it and make changes. Several agencies provide their employees access to EEX; the only annuitants with access are U.S. Department of State Foreign Service Annuitants. The exact information provided by each agency will vary depending on what data they want their employees and annuitants to be able to see and change within EEX.

For every employee and annuitant that uses EEX, the master data file contains their full name, social security number, and may contain their home address. Depending on how their agency elected to use EEX, the master data file for an employee or annuitant may also contain the following information:



- Financial transaction information: direct deposit, health savings, and financial allotments, bank routing code, account number, account type, deduction amount
- FEHB information: FEHB enrollment code, date of birth, premium conversion information, relationship type, marital status, sex, dependent/spouse information (name, SSN, address, date of birth, phone number, email address)
- Thrift Savings Plan/Roth information: dollar amount, percentage amount, future effective date
- Federal and state tax information: marital status, number of exemptions, additional deduction amount
- Address transaction-related information: paycheck/home mailing address (street, city, state, zip code, county)
- Disability indicator: disability categories and associated impairments
- Ethnicity and race: ethnicity and race category
- Emergency contact information: home phone number, email address
- Federal Employees Group Life Insurance: Basic, Option A, Option B, Option C

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

EEX receives personnel and payroll data from payroll providers containing information provided by the participating agencies. The payroll providers transmit that data securely to EEX according to their bi-weekly payroll schedules. EEX then makes each record available to that employee or annuitant through EEX.

Information is also collected directly from employees and annuitants who make changes to their payroll and personnel information using EEX. The changes they make are recorded and sent to the payroll providers each day.



EEX does not modify the master data file, thus any requested changes are reflected in the next pay cycle when EEX receives a new master data file from the agency's payroll office through the respective payroll provider.

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

EEX does not use information from commercial sources or publicly available data.

2.4. Discuss how accuracy of the data is ensured.

The data in EEX comes from several other systems that are not owned or managed by OPM, so OPM has limited ability to confirm the incoming data is accurate. OPM can and does check whether (a) the number of records the agencies intended to send matches the number of records received and (b) certain types of information, such as zip codes, are in the expected format. Fortunately, each employee can review their own data in EEX and confirm it is accurate or requires an update.

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

Privacy Risk: There is a risk that the information input by an employee or annuitant will not be accurate or that the information will not be accurately transmitted to the appropriate payroll provider and participating agency.

Mitigation: This risk is mitigated because the system employs user verification prompts which require the employee or annuitant to confirm the accuracy of their information before a transaction is finalized. In addition, EEX creates an audit log all transactions to check for anomalies and verify they were correctly captured. Failure notifications are sent to system administrators for corrective action, when necessary.

Privacy Risk: There is a risk that more information than necessary will be maintained in EEX.



Mitigation: This risk cannot be completely mitigated by EEX as it is the responsibility of each agency to determine which transactions its employees and annuitants will be able to conduct in EEX and what information the agency provides to enable those transactions.

Section 3.0. Uses of the Information

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

EEX uses the information provided by the payroll providers and participating agencies to allow employees and annuitants to view and update their information. This includes a variety of discretionary personnel and payroll transactions (e.g., changes to Financial Allotments, Health Benefits, Thrift Savings Plan, Direct Deposit, Federal and State Taxes, and Home Address). EEX provides employees and annuitants direct control over their information and eliminate the need to fill out, submit, and process paper forms.

EEX transmits the information entered by employees and annuitants to the payroll providers so participating agencies can update their payroll and personnel records. The participating agency then provides an updated record to EEX that the user can access after the transaction is processed.

The user transactions are maintained in EEX for uses to see and, to facilitate user verification, and for quality control. Application and security logs are also maintained.

EEX uses social security numbers to identify which records belong to which individual because that is the only unique identifier recognized by the several systems that communicate with EEX. Social security numbers are also included in certain documents available in EEX (e.g., W2 tax documents).



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.

EEX does not use technology to conduct electronic searches, queries or analyses of the information it collects and stores.

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

Only the OPM EEX project team, support staff, and network administrators have access to EEX within OPM. EEX does share information with the eOPF and OPM's Federal Employees Health Benefits Systems (FEHB) Data Hub, but those programs do not have direct access to EEX.

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

Privacy Risk: There is a risk that an unauthorized user may access the information or that authorized administrative users of EEX may access EEX information for non-authorized purposes, such as performing searches on themselves, friends, relatives, or neighbors.

Mitigation: OPM provides all personnel (users, developers, system admins, and help desk personnel) with initial and annual IT Security and Privacy Awareness training to educate them concerning the proper handling of personally identifiable information and the protection of information systems. EEX users also receive agency specific training for EEX and complete agency specific System Rules of Behavior. EEX access controls prevent employees and annuitants from accessing any other EEX user's information. In addition, access to "production" data is limited to EEX database administrators and enforced through system access controls. All access to EEX is logged to include session details such as logon/logoff, actions taken, date and time, and other events required to investigate misuse or unauthorized access to information.



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.

Federal employees and annuitants who log into EEX are provided notice concerning EEX and the information it collects through the website's Privacy Policy and through a series of frequently asked questions about EEX. In addition, when participating agencies provide instructions to their employees concerning the use of EEX, they are provided with information concerning the system and their ability to conduct transactions. This PIA also provides notice to individuals regarding EEX.

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

Employees and annuitants who do not wish to use EEX can instead submit equivalent changes on paper forms to their agencies. Employees and annuitants who use EEX consent to their information being provided to their respective agency to update their information.

4.3. Privacy Impact Analysis: Related to Notice

Privacy Risk: There is a risk that individuals were not provided notice prior to the collection of their information and are unaware that their agency provides their information to EEX.

Mitigation: This risk is mitigated by providing information to employees and annuitants when they log in to EEX. In addition, participating agencies provide information to their employees and annuitants concerning EEX and how it is used.



Section 5.0. Data Retention by the Project

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

Payroll providers send an updated record to EEX bi-weekly, and when they do, it overwrites the prior record in EEX since all EEX records are transitory and can be deleted when no longer needed for business use. The information is retained at each participating agency in accordance with GRS 2.4, referenced in Section 1.4. Transaction history, such as any changes requested by a user, is subject to GRS 3.1 and available to be viewed by employees and annuitants who use the system for five years.

5.2. Privacy Impact Analysis: Related to Retention

Privacy Risk: There is a risk that information in EEX will be retained for longer than is necessary for its intended purpose.

Mitigation: This risk is mitigated by identifying appropriate NARA retention schedules for the information in the system and adhering to the established timeframes.

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.

EEX receives data from the payroll providers of the participating agencies that elect to use EEX. EEX provides information submitted by employees and annuitants back to the participating agency through their payroll provider. OPM does not otherwise provide the information in EEX to any other third party in the normal course of business.



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

The participating agencies that provide information to EEX are responsible for ensuring that their applicable SORNs permit that disclosure. EEX itself serves as a technical interface for the participating agency employees and annuitants and does not own the information or share it with any third party.

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

Participating agencies sign both an interconnection security agreement (ISA) and memorandum of understanding (MOU) which state the agency, and their payroll provider, will delete the transaction files they receive from EEX within 90 days. There are no other limitations on re-dissemination of the information imposed on the agencies or payroll providers because the data in EEX is owned and governed by the participating agencies.

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

The participating agencies that provide information to EEX are responsible for ensuring that their applicable SORNs permit any disclosures they make and are responsible for recording those disclosures. EEX itself serves as a technical interface for the participating agency employees and annuitants and does not own the information or share it with any third party. EEX does maintain a record of all changes requested by employees and annuitants for at least 5 years after the change occurred.

6.5. Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk that information in EEX will be shared externally for a purpose inconsistent with the original purpose for which it was collected.

Mitigation: This risk is mitigated by having each participating agency sign both an ISA and MOU that outline the purpose of EEX and appropriate actions concerning the data. These agreements require both OPM and the participating agencies to adhere to Privacy Act requirements in any



information use or disclosure. This risk cannot be completely mitigated by OPM, however, because the participating agencies retain ownership and control of their data.

Section 7.0. Redress

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

EEX provides employees and annuitants direct access to their information. Employees and annuitants are initially provided a temporary password to access their information in EEX. During their initial access they are instructed on establishing a username and password and/or registering their PIV.

In addition to direct access to EEX, employees and annuitants can request access to their information by following the procedures set out in the applicable SORN and their agency's Privacy Act regulation, or as otherwise instructed by their individual agency.

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

Employees and annuitants who have received an EEX temporary password or who have established a username and password or registered their PIV card in EEX have direct access to their information to make certain corrections or provide updates.

To the extent there is information in EEX that the employee or annuitant cannot correct, for example, because it is not the type of transaction their agency has opted to address in EEX, or if there is information that the employee or annuitant corrected in EEX but a corresponding correction was not made in the agency's master data file and returned to EEX, the employee or annuitant must contact their agency directly. This can be accomplished according to the procedures set out in the applicable SORN



and/or in the agency's Privacy Act regulation, or as otherwise instructed by the individual agency.

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

Participating agencies provide information regarding EEX directly to their employees and annuitants concerning how to use EEX and what transactions they can access and correct. In addition, individuals are provided notice of procedures through the applicable SORN, Privacy Act regulation, and this PIA. Employees and annuitants can also contact the EEX customer service helpdesk for information and instruction concerning how to correct their information.

7.4. Privacy Impact Analysis: Related to Redress

Privacy Risk: There is a risk that employees and annuitants will not understand how to access and correct their records in EEX.

Mitigation: This risk is mitigated by the participating agencies, who provide direct information and instructions to their employees and annuitants, and by OPM, which maintains a customer service helpdesk and provides information on the EEX website in the form of frequently asked questions and other documentation. Moreover, the paper-based processes that EEX automates are still in use and available to those who choose not to, or are unable to, utilize EEX to submit corrections to their 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?

All ISAs and MOUs related to EEX are reviewed annually to ensure that they are accurate and being implemented appropriately. EEX also undergoes an annual Statement on Standards for Attestation Engagement (SSAE18)



audit conducted by a third party on behalf of the OPM Office of Inspector General.

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

All OPM employees receive annual IT Security & Privacy Awareness Training which covers the proper handling of PII. In addition, the EEX User Board requires that all participating agencies provide specific training regarding EEX for their employees.

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

EEX can be accessed through the Internet (www.employeeexpress.gov). Each participating agency provides information to their employees concerning how to access EEX. Each participating agency chooses which EEX system options are visible and available on the EEX external website accessed by users from their own agency.

EEX is managed by a small team of developers and database managers who also have access to the PII to maintain the system. Most of those staff only have read-only access, and the few who have authority to delete the data will not do so without explicit instructions from an 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?

All ISAs and MOUs are reviewed annually. Annual reviews consist of examining the technical and security aspects of the data connections, securing of information exchanged and status of system accreditations. Participating agencies are responsible for providing their employees and annuitants with access and determining which transactions will be available and what information to provide in the master data file.



Responsible Officials

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