



Privacy Impact Assessment for
USA Learning (USAL)

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Abstract

USA Learning (USAL) is OPM's new enterprise learning management system (LMS) that will replace all existing LMS platforms across the agency. USAL facilitates centralized training administration, course delivery, learning records, and certification tracking, while aligning learning opportunities with critical skill gaps to help build a strong, agile federal workforce. USAL enables OPM to deliver mandatory compliance training, professional development, and certification programs to OPM staff. USAL also enables OPM program offices operating government-wide programs to provide training to federal employees across the government. This PIA is being conducted because USAL collects, maintains, and uses personally identifiable information.

Overview

USAL is a Software-as-a-Service platform hosted on a FedRAMP-authorized infrastructure and built on TotaraGov. It replaces several current OPM online training systems with one unified and secure learning environment.

USAL is a centralized platform that facilitates the delivery of training and development content to OPM employees and contractors. It ensures compliance with agency-specific and government-wide training mandates, including ethics, cybersecurity, and records management training. It facilitates the delivery, tracking, and management of mandatory compliance training, professional development, and agency-specific learning programs. USAL also enables OPM to curate and assign skills-building pathways/journeys, support career mobility, and map employee learning data to agency mission needs.

USAL is also used by OPM program offices operating government-wide programs to provide learning and development programs to staff at other federal agencies. These include Delegated Examining Certification, Senior Executive Service development, USA Performance training and resources,



USA Staffing training and resources, and Retirement Benefits Officer training. USAL ensures OPM fulfills its role in building and maintaining a capable and ready workforce.

Access to the system is restricted to authorized users who have been provisioned accounts through approved OPM program offices. These may include:

- OPM employees,
- Federal employees from other agencies participating in government-wide training programs,
- Designated training coordinators and system administrators responsible for course delivery and learner oversight, and
- Government contractors (only those with validated .gov, .mil, and limited .edu email accounts).

Role-based access controls are implemented within the LMS to ensure that users can only access content and data appropriate to their responsibilities and permissions. The system also maintains activity logs and audit trails to support accountability, performance tracking, and data integrity.

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 U.S.C. Chapter 41 – Training and 44 U.S.C. 3544 – Federal agency responsibilities.

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

OPM/GOVT-1, General Personnel Records (77 FR 73694, 87 FR 5874, 88 FR 56058), available at www.opm.gov/privacy.



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

Under development, aligned with NIST SP 800-53 Rev 5 FedRAMP Moderate baseline.

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

Yes: GRS 2.6, item 030, Individual employee training 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.

USAL is accessed by federal employees and authorized federal contractors to complete training and development activities in support of their agency's mission. The system primarily collects administrative and performance related data, such as course registrations, completion records, and training progress. Federal contractors accessing the system do so solely to complete required agency training. All administrative data is used for internal tracking. These activities do not require an OMB Control number.

Section 2.0. Characterization of the Information

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

The following groups of individuals access USAL for the following reasons:

- All OPM employees access USAL to complete their required trainings and may also use it to complete optional trainings.
- Federal staff across the government access USAL to complete OPM provided trainings. For example, delegated examiners from many federal agencies may use USAL to complete the OPM-provided training required to be a delegated examiner and Senior Executive Service



(SES) staff may use USAL to complete their SES leadership development courses.

- Additional OPM employees and/or contractors access USAL to develop and lead trainings hosted by USAL, manage the system, provide technical support to other employees, and validate whether people are completing their required courses.

USAL may collect the following information about the individuals given access: name, work email, organizational code, job series, job title, supervisory status, individual development plan, training history, course progress, certifications, and competencies.

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

Other OPM systems determine who should access USAL and which trainings are required or recommended. For example, the OPM system tracking Delegated Examiners identifies who should access USAL to complete the Delegated Examiner trainings. That information either goes directly from that system to USAL or is manually sent by the program office responsible for assigning the training and then manually added by OPM staff.

Individuals given access to USAL can complete required and optional trainings, plus chose which optional trainings they want to complete.

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

2.4. Discuss how accuracy of the data is ensured.

USA Learning is committed to ensuring all data within the system is accurate, complete, and up to date. The following processes and controls exist to support data accuracy across the system lifecycle:



1. Data Entry Controls and Validation:

- a. Role-Based Access: The information a user can input or edit is determined by their role in the system.
- b. Input Validation: System-enforced rules ensure formatting standards (e.g. date formats, course codes, completion statuses) are adhered to at the time of entry.
- c. Auto-Population from Authoritative Sources: Where possible, user data (e.g. name, employee ID, email) is synchronized with authoritative agency HR systems to reduce manual entry errors.

2. Data Reconciliation Audits:

- a. Completion Record Audits: Periodic scans of course completion data are conducted to identify inconsistencies (e.g. missing timestamps, duplicate entries, incomplete modules).
- b. Manual Spot Checks: LMS Administrators conduct regular reviews of a randomized sample of training records for accuracy and completeness.
- c. Agency Reporting Feedback Loop: Agencies can request corrections or flag anomalies by sending notifications to the USAL administrators for validation and remediation.

3. Data Update Protocols:

- a. Change Logs: All modifications to learner records (e.g. completion status, name changes, account merges) are timestamped and logged for traceability.
- b. Learner Self-Service: Learners can request updates or corrections to their profiles via secure request channels, subject to verification and approval workflows.
- c. Audit Trail Reports: Full audit logs of system activities are retained to support data integrity reviews and investigations.

4. Quality Assurance During Data Transfer:

- a. ETL Process Validation: When importing/exporting data during bulk uploads, data integrity checks and validations are conducted to ensure fidelity.



- b. Error Handling: Failed imports and mismatched records are flagged for administrator review with documentation of any corrective actions applied.

5. Oversight:

- a. System of Records Notice (SORN): Data is managed in accordance with applicable SORN and system-specific data handling procedures.
- b. Training and SOPs: Users responsible for data input and oversight are trained regularly on data accuracy protocols and responsibilities.

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

Privacy Risk: Inaccurate training or profile data may affect reporting or certification tracking.

Mitigation: USAL has a multi-step validation and quality assurance approach to ensure data accuracy and integrity:

1. System Validation Controls:

- a. Input validation rules are enforced at the data entry stage (e.g. required field, character limits, format constraints, and value ranges).
- b. Drop-downs and controlled vocabulary reduces free-text entry errors.

2. Periodic Data Reconciliation:

- a. Training completion records and learner profile data are reconciled on a scheduled basis (e.g. quarterly) against authoritative source systems (e.g. HR or assessment tracking systems, where applicable).

3. User Self-Audit Capabilities:

- a. Users have access to view and request correction to their personal training records and profile data through the help desk and the designated LMS administrator.



4. Error Reporting and Escalation Protocol:
 - a. Reported discrepancies or flagged errors triggers a review process by agency training administrators before any compliance action or certification status change is taken.
 - b. Administrators must validate discrepancies through a standard procedure.
5. Audit Logging and Review:
 - a. All updates to training records or user profiles are logged and change histories are accessible to administrators for audit and verification purposes.
6. Training for Data Stewards:
 - a. System users with data entry or administrative roles receive training on proper data handling, records management procedures, and validation responsibilities.
7. System-Wide Notifications of Known Data Issues:
 - a. When known data anomalies are discovered, users are notified through system alerts and a pause may be placed on specific reporting and compliance-based decisions until data is validated.
8. Clearly defined user responsibilities and help desk support can help users review and correct their records. System interfaces encourage self-verification, and training coordinators are available to assist with persistent issues.

Section 3.0. Uses of the Information

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

USAL collects and uses user information to deliver personalized and compliant training experiences for users. The information is used to:

1. Establish and manage user identities and access controls:
 - a. The system authenticates and authorizes users based on assigned roles (e.g. learner, supervisor, administrator), which



determines user access to specific training content and reporting tools.

2. Support regulatory and agency specific training requirements
 - a. Data such as job series, job title, supervisory status, etc. may be used to assign mandatory courses (e.g. cybersecurity, ethics, anti-harassment, FOIA) based on agency policy or compliance frameworks.
3. Enable tailored learning paths and journeys
 - a. The system uses profile and development plan data to recommend or assign learning that aligns with the user. These may include:
 - i. Onboarding and new hire requirements
 - ii. Credentialing or certification preparation programs
 - iii. Reskilling Initiatives
 - iv. Leadership development sequences
 - v. Competency-based training tracks
4. Track and validate training completions and certification progress
 - a. User data supports real-time tracking of course progress, completion dates, and certification milestones which are reportable to supervisors and training officers.
5. Generate role-based reports and compliance dashboards
 - a. Aggregated and role-specific data enables agency training managers to monitor compliance, identify gaps, fulfill audit requirements, and support evidence-based workforce planning
6. Enhance user experience and system efficiency
 - a. Information such as previously completed courses may be used (where applicable and authorized) to improve course recommendations, user interface design, and navigation.



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.

USAL supports OPM's goal of recommending and offering trainings that can close critical skill gaps, help reskill staff for new roles and improve staff readiness for high-priority roles.

In the future, USAL may eventually use AI to help create a personalized learning plan (i.e., recommended list of optional classes) based on the employee's organizational code, job series, training history, and similar information.

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

USAL supports tracking of required and elective training to assist agencies in ensuring employees meet statutory and regulatory learning requirements as well as developmental goals. When a user is assigned a required course or certification path, USAL monitors their course progress, completion status, and expiration dates (when applicable).

A learner's OPM supervisor, an OPM training officer, and/or an OPM agency-designated training official will have access to a learner's training records to determine whether they completed their assigned trainings. These OPM staff will be instructed to manually verify a learner did not complete their training before taking action against that learner. For example, the staff may need to use reporting tools and completion logs to validate whether the training was properly assigned and accessible to the learner. This step ensures that no action is taken based solely on system data until a designated official verifies its accuracy.

This verification is important because training completions may be used to inform performance evaluations, certification renewals, and eligibility for advancement in agencies that link development milestones to career progression.



OPM's Office of the Chief Human Capital Officer, Office of Workforce Policy and Innovation, and agency HR partners may receive aggregated data for skills gap analysis, succession planning, and strategic workforce development. HR partners may include:

1. Training and Development Specialists who oversee compliance with agency-mandated learning programs.
2. Delegated Examining Unit Points of Contact (POCs) who verify qualifications and ensure compliance with the delegated authority granted from the OPM.
3. Chief Learning Officers or Workforce Planners who use system data to identify reskilling needs, talent gaps, and development opportunities.

All data access is role-based and subject to audit logging, in compliance with applicable security and privacy controls.

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

Privacy Risk: Learning data collected for training and development purposes may be used to evaluate employee performance or making employment decisions. This could result in unintended consequences for individuals if data is misinterpreted or taken out of context.

Mitigation: Policies limiting use to workforce development purposes, role-based access controls, audit logging and oversight, transparency in notices, and manually verifying the individual was instructed to complete the course and had opportunity to do so.

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.

Users receive notices when they access the system, which includes a Privacy Act statement and rules of behavior notice.



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

All users are informed how USAL will use their information, and what will happen if they do not use the system, via the notices mentioned in 4.1.

Users can choose not to use USAL, but this is the only system that can be used to complete their required trainings and not completing the mandatory trainings can result in an adverse action.

4.3. Privacy Impact Analysis: Related to Notice

Privacy Risk: There is a risk that OPM staff will not understand that they need to use this system to complete their training or how their PII will be used.

Mitigation: This risk is mitigated by providing staff guidance on when they need to use USAL in emails, a USAL login notice (privacy notice and rules of behavior), and FAQs within USAL. The above-mentioned users who need access to reports about other USAL users receive training on how to use and protect those reports before they are given access.

Section 5.0. Data Retention by the Project

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

[GRS 2.6: Employee Training Records](#). Records are retained consistent with OPM and NARA policy. Retention allows tracking of long-term learning trends and meet federal reporting, audit, and compliance obligations.

5.2. Privacy Impact Analysis: Related to Retention

Privacy Risk: USAL data is retained longer than necessary.

Mitigation: Routine records reviews are conducted by system administrators to identify outdated, redundant, or obsolete information that no longer serves a valid business purpose. Automated and/or manual



workflows to delete outdated data are in place in accordance with data retention policies.

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.

OPM is partnering with Skillsoft to let USAL learners take Skillsoft courses and record course completion in their USAL account. To accomplish this, USAL will share a learner's PII with Skillsoft when they enroll and receive PII from Skillsoft when the learner completes a course. This data transfer will be governed by a contract and other agreements.

De-identified, aggregated training may be shared with OMB or relevant oversight bodies. Other agencies may ask OPM for information from USAL to confirm that their staff completed a training or certification using USAL. For example, an agency may want to confirm its Delegated Examiner staff completed the OPM required Delegated Examiner training.

Beyond the above, individual-level data is retained within OPM unless required by law or pursuant to a routine use associated with the system.

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

Sharing aligns with existing routine uses under OPM SORN GOVT-1, General Personnel Records.

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

Reuse outside the scope of workforce development requires written approval from the USAL System Owner.



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

USAL generates system audit logs that track if and where information is shared outside the system.

6.5. Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk that the information will be improperly shared outside OPM.

Mitigation: This risk is mitigated by encrypting the data, agreements with SkillSoft, and internal disclosure review procedures. The internal disclosure review procedures will be available to all users with elevated access and outline the need to verify legal authority for disclosure, ensuring that only the minimum necessary data is shared, and ensuring that appropriate safeguards are in place.

Section 7.0. Redress

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

End users can access their training history, profile, and learning progress through the learner dashboard. Individuals can also request access to their records by following the "record access procedure" described in OPM/GOVT-1.

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

Federal staff completing a particular OPM assigned training (e.g., delegated examining certification) can contact the office that manages the training. All OPM staff can also contact usalearning@opm.gov. They can also request amendment of their records by following the "contesting record procedure" described in OPM/GOVT-1.



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

Instructions on how to report or request record corrections are provided in the help documentation and through the user support center. Individuals may also request amendment of their records by following the “contesting record procedure” described in OPM/Govt-1.

7.4. Privacy Impact Analysis: Related to Redress

Privacy Risk: Users may not realize they are responsible for identifying and correcting data errors.

Mitigation: Orientation materials and support documentation emphasize the user’s role in reviewing training data and taking corrective action through designated channels.

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?

The system employs role-based access controls, system monitoring, and internal audits to enforce compliance with this PIA.

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

All system users complete OPM’s annual privacy and security training.

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

Reviewed quarterly by the system owner and Information System Security Officer (ISSO).



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 new uses and sharing agreements undergo OPM Privacy Office review and must align with USAL's workforce mission.

Responsible Officials

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