

Exhibit D



Privacy Impact Assessment for

USA Staffing®

July 28, 2021

Contact Point

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Abstract

USA Staffing® is the U.S. Office of Personnel Management's (OPM) talent acquisition system for Federal agencies. The USA Staffing Program Office offers USA Staffing as an Agile software as a service Talent Acquisition System. USA Staffing automates policies, practices, and laws for the full range of Federal hiring and is the primary interface for Federal Human Resources (HR) professionals, Hiring Managers, applicants, and new hires interacting with the hiring process. USA Staffing supports government-wide requirements for the entire end-to-end hiring process from Classification through Onboarding. USA Staffing supports the OPM mission by combining the benefits of shared services with the knowledge of and compliance with all Federal HR and Information Technology (IT) policies in one solution, enabling agencies to complete the full scope of talent acquisition and onboarding in a single system to achieve a trusted Federal civilian workforce. This Privacy Impact Assessment is being conducted because USA Staffing collects, maintains, and uses personally identifiable information about applicants for Federal employment.

Overview

USA Staffing® is the U.S. Office of Personnel Management's (OPM) talent acquisition system for Federal agencies. The USA Staffing Program Office, in partnership with the Office of the Chief Information Officer, offers USA Staffing as an Agile software as a service Talent Acquisition System. As an Internet-enabled software-based enterprise, USA Staffing automates policies, practices, and laws for the full range of Federal hiring and is the primary interface for Federal Human Resources (HR) professionals, Hiring Managers, applicants, and new hires interacting with the hiring process. USA Staffing supports government-wide requirements for the entire end-to-end hiring process from Classification through Onboarding. Federal agencies purchase the services of USA Staffing from OPM's USA Staffing Program Office through an Interagency Agreement (IAA) under the provisions of the



Revolving Fund, 5 U.S.C. §1304 (e) (1), which permits OPM to perform human resources management services for Federal agencies on a cost-recovery basis. There are two interfaces for USA Staffing users: 1) a public-facing web page for applicants and new hires in the onboarding process, which they reach by signing in at USAJOBS.gov; and 2) a separate non-public interface for the subscribing agencies to perform core HR and hiring manager functions. Agencies use USA Staffing to develop and post job opportunity announcements, create web-based assessment tools, store and reuse assessment and announcement templates, refer and select candidates, manage employee onboarding, and develop a variety of standard and custom reports. Of note, USA Staffing is fully integrated with USA Hire, its online assessment platform delivering high-quality, professionally developed assessments. Access to each aspect of the non-public portion of USA Staffing is controlled by permission profiles, with the proper profile for each user determined by the subscribing agency.

In 2012, OPM's Human Resources Solutions (HRS) and Office of the Chief Information Officer (OCIO) initiated a multi-year upgrade of the system (i.e., the "USA Staffing Upgrade") to replace the system that is now called "USA Staffing Legacy." USA Staffing, in its upgraded form, is designed to better support future growth and increased usability for applicants, HR, and hiring managers. USA Staffing facilitates hiring for over seventy agencies, handles the full range of hiring flexibilities and requirements, is scalable in support of high-volume hiring, and must comply with Federal IT security requirements. USA Staffing currently consists of two operating systems, Legacy and Upgrade, while the USA Staffing Program Office and Federal agencies complete the decommissioning of USA Staffing Legacy planned for September 2022. USA Staffing Legacy is in the latter stages of decommissioning. As of July 2021, only 132 users have "read-only" and "reports" access to the Legacy system – down from a peak of over 10,000 users in prior years.



USA Staffing allows agencies to review applications, resumes, and other documents online, rate and rank applicants using single or multiple assessments, and electronically refer candidates to hiring officials for review and selection. HR professionals use USA Staffing to notify applicants of their status throughout the hiring process. USA Staffing is fully integrated with USAJOBS® and USA HireSM to ensure secure process for exchanging information between the systems and to help streamline the overall application process.

USAJOBS is the Federal Government's official employment site, serving as a unified place for American citizens to find Federal job opportunities. Federal HR professionals can post job opportunity announcements to the USAJOBS website for public notification. Applicants sign in to the USAJOBS website to begin the application process. USA Staffing then accepts the USAJOBS account information and USAJOBS application materials, collects additional information from the applicant and responses to custom-designed assessment tools, and then is used by agency HR professionals to rate job applications. USA Staffing also shares limited information with USA Hire that allows USA Hire to contact the applicant and administer any required testing.

The USA Staffing program uses FootPrints, a web-based service desk and customer support tool, to centrally manage help ticket submissions from both HR users and applicants. This help desk functionality is integrated with USA Staffing and USA Hire user interfaces and Application Manager to allow HR users and applicants to submit help desk inquiries or to request a USA Hire Reasonable Accommodation. For Reasonable Accommodation requests, the help ticket will also facilitate the collection of documentation to support the Reasonable Accommodation claim.

HR users and applicants submit help tickets for assistance through an Application Programming Interface (API) accessible to users or applicants using the various components of the system. All help tickets created by HR users or applicants are managed in workspaces dedicated to that area of the system: USA Staffing, USA Hire, Reasonable Accommodation, and Applicant



support. One exception to the API ticket submission is when an applicant requests a Reasonable Accommodation for a USA Hire job announcement by responding positively to the Reasonable Accommodation question in the online application. Once USA Staffing verifies the applicant is tentatively eligible, it checks with USA Hire to determine if the applicant has taken the same USA Hire assessments within the last 12 months. If they have, their existing scores will be re-used. If the applicant does not have previous scores and is tentatively eligible, the USA Staffing system will create a Reasonable Accommodation FootPrints ticket on the applicant's behalf. OPM's Reasonable Accommodation team will use the ticket to communicate the Reasonable Accommodation requirements to the applicant via email. If the applicant meets the requirements and has supporting medical or disability related information to substantiate a claim, they can provide that documentation via their help ticket. The document(s) will be available to view for adjudication purposes within the FootPrints ticket. Once submitted, the document becomes a part of that help ticket and remains attached; however, it does not transmit back and forth as the Reasonable Accommodation team and applicant communicate. All container/workspaces are controlled by permissions within FootPrints, so only the support team handling the Reasonable Accommodation help desk will have access to the documents submitted by the applicant.

Once a job announcement is closed for receipt of applications, USA Staffing generates lists of qualified and/or highly qualified candidates for the job and makes the lists available for viewing by the applicable subscribing agencies' hiring managers. These hiring managers can then select the most qualified candidates and register their selections. Then, USA Staffing performs the necessary processes to reflect the selection actions while providing an audit trail of the evaluation and selection process. Finally, USA Staffing facilitates the onboarding process from tentative job offer through entry on duty, automating the collection of form data for personnel security, benefits, payroll, provisioning, and other steps in the pre-employment, vetting and onboarding process.



USA Staffing collects candidate information provided by the job applicant for the purpose of employment consideration. OPM ensures the security of USA Staffing and the information from the subscribing agencies and applicants through compliance with the Federal Information Security Modernization Act, National Institute of Standards and Technologies Standards and Special Publications , Open Web Application Security Project recommendations for Internet application security, and HR industry best practices.

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?

OPM and other Federal agencies rate applicants for Federal jobs under the authority of sections 1104, 1302, 3301, 3304, 3320, 3361, 3393, and 3394 of title 5 of the United States Code. Section 1104 of title 5 allows OPM to authorize other Federal agencies to gather information in order to rate applicants for Federal jobs.

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

The Privacy Act System of Records Notices that apply to the information contained in USA Staffing are OPM /GOVT-5 Recruiting, Examining, and Placement Records, OPM/ GOVT-6 Personnel Research and Test Validation Records, and OPM / GOVT-7 Applicant Race, Sex, National Origin, and Disability Status Records. A separate System of Records Notice to more clearly cover help desk and reasonable accommodation records is currently under development.

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

Yes. A system security plan was completed as part of the system's Authority to Operate (ATO) on January 8, 2019 that expires September 1, 2023. A system security plan was completed as part of the ATO package.



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

Yes, N1-478-11-004, item 2.

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 information in USA Staffing is obtained from a variety of forms, some of which are not subject to the PRA and others that are and have OMB control numbers, including the USA Staffing interface that is covered by OMB Control number 3206-0040. Please see the list of onboarding forms on USA Staffing's Resource Center:

https://help.usastaffing.gov/ResourceCenter/index.php?title=USA_Staffing_Resource_Center

Section 2.0. Characterization of the Information

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

USA Staffing collects the following mandatory information from applicants: Vacancy Identification Number, Title of Job, First Name, Last Name, Address, City, State, Zip Code, e-mail address, Country, Citizenship, Lowest Grade, Occupational Specialties, Geographic Availability, Veterans' Preference (where applicable), and Dates of Active Duty for Military Service (where applicable). USA Staffing Legacy required the collection of Social Security Number to enforce applicant uniqueness.

All other information collected from USA Staffing applicants is deemed optional and will vary as determined by the agency user. This information may include Middle Initial, Telephone Number, Contact Time, Fax Number, Fax Extension, Permanent Phone Number, Permanent Phone Number Extension, Place of Employment, Work Address, Work State, Work Country,



Work City, Work Zip Code, Employment Availability (Full Time Employment, Temporary Employment, Jobs Requiring Travel, Part Time Employment, Special Accommodation, Other Employment Questions), Background Information, Gender, Date of Birth, Languages, Hiring Eligibility, Professional Skills, Test Location, Availability Date, Service Computation Date, Job Preference, Transition Assistance Plan, Job Related Experience (Years, Months), and Education Information (College or University).

Customizations of the optional fields, as well as customization of additional responses collected from applicants via a questionnaire, are made by agency users as needed for their vacancies. As determined by agency users, some vacancies may accept and/or require supporting documentation in order to rate and qualify an individual for a particular position.

Applicant ratings from assessments and written tests may be used and maintained in USA Staffing as determined by agency users. Information is accessed by the agency office that posts the vacancy announcement or by the hiring manager who posted the vacancy announcement. Onboarding staff at the subscribing agency may require additional personal information, such as name, address, and SSN and financial/payroll information such as allotments and banking information. USA Staffing also collects personnel and benefits data related to the job position.

USA Staffing also allows the collection of several document types including Resumes, Cover Letters, Transcripts, Qualifications, Veterans Documentation, and Others requested by the hiring agency. A full list of supporting document types can be found in USA Staffing's Online Help system:

https://help.usastaffing.gov/USAS/index.php?title=Help_for_USA_Staffing_HR_Users

The content of the document can include information that may or may not have been requested by the agency. USA Staffing cannot control the content of any supporting document provided by an applicant.



Through the FootPrints system, USA Staffing also collects Help Desk ticket information, including the nature of the problem experienced and contact information for the user. Reasonable Accommodation requests also include the applicant's supporting documentation to support a request for Reasonable Accommodation for a job announcement that used USA Hire.

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

Applicant information is collected directly from the individual via the USA Staffing Internet interface. Human Resources users also enter applicant data directly into USA Staffing. Applicants complete and submit their information voluntarily using any supported Internet browser. Within the application process, applicants may also choose to transfer their demographic information and resumes from USAJOBS to USA Staffing in real-time. USA Staffing also receives assessment score data from USA Hire. The secure process for exchanging the information is defined in a Memorandum of Understanding and an Interconnection Security Agreement between USA Staffing, USAJOBS, and USA Hire. Information obtained via FootPrints is collected directly from applicants who may request Reasonable Accommodation, or HR specialists and applicants who experience technical or functional issues with USA Staffing and require support or assistance.

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

USA Staffing does not use any commercial or publicly available data.

2.4. Discuss how accuracy of the data is ensured.

As data is collected in USA Staffing, accuracy is ensured by a combination of field restrictions and user confirmation. Field restrictions are when the system only allows users to enter data that has certain restrictions, such as choosing a valid United States state name from a list or limiting announcement fields to the number of characters that can display on USAJOBS. User confirmation is when the system will ask the user to validate



the data they have entered is accurate before they can proceed to other sections.

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

Privacy Risk: There is a risk of collecting inaccurate or falsified information from the applicants, which may result in unfavorable hiring decisions.

Mitigation: The risk of collecting inaccurate information is mitigated through the use of field restrictions that permit applicants to enter data only within certain parameters and through the use of user confirmation, in which USA Staffing asks the user to validate that the information submitted is accurate. Generally, applicants have an interest in ensuring that the information they provide is accurate and USA Staffing does not otherwise validate the information collected from the users and applicants. The risk that applicants will provide falsified information in an effort to obtain more favorable hiring decisions is mitigated by providing them with notice to fill out information on the site completely and truthfully. Applicants are also warned that knowingly falsifying or concealing a material fact is a felony, which may result in fines and/or up to five (5) years imprisonment.

Privacy Risk: There is a risk that USA Staffing will collect more information than is necessary, including unnecessary PII, to make appropriate hiring decisions.

Mitigation: USA Staffing mitigates this risk by allowing agencies to modify the customized PII requests such that only PII relevant to the specific application is requested. Applicants are also notified as to whether requested information is required or optional. This risk cannot be fully mitigated because applicants are permitted to upload documents that may contain information not required by USA Staffing or the participating agencies. Applicants are cautioned, however, not to provide sensitive PII unless it is specifically requested. Additionally, as customer agencies migrate from using



USA Staffing Legacy, collection of SSNs for applicants has been eliminated at the time of application, minimizing the risk of exposure.

Section 3.0. Uses of the Information

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

The information collected and maintained in USA Staffing is used to effectively recruit, assess, certify, and onboard candidates for Federal positions across the government. The Federal government relies on more than two million United States citizens and foreign nationals to work in the civil service to fulfill its essential duties. USA Staffing operates to refer interested and qualified applicants to hiring managers for vacancies to which they have applied and provides subscribing agencies the ability to acquire, assess, certify, select, and onboard qualified candidates precisely, efficiently and cost-effectively. It provides the up-to-date tools agencies need for strengthening the employment foundation of government. All applicant information provided to USA Staffing is needed to make the necessary suitability, eligibility, and qualification determinations and perform referrals to hiring managers. SSNs were collected in USA Staffing Legacy as an applicant identifier. To reduce the risks associated with collecting SSNs, USA Staffing developed a process to assign a unique identifier to users in the USA Staffing Upgrade, thus eliminating the collection of SSNs from applicants and reserving the collection of the full SSN for the onboarding phase when the full number is required for pre-employment processing, vetting, and suitability.

Information collected in the FootPrints system is used to resolve technical and functional issues experienced by HR and applicant users and to collect information required to adjudicate requests for Reasonable Accommodation for USA Hire online assessments.



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.

Yes, USA Staffing provides Advanced Searching capability for HR users and a business intelligence solution for data reporting and analysis.

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

USA Staffing maintains secure interconnections with other OPM solutions including USAJOBS, USA Hire, HR Links, and eOPF. USA Staffing shares information with USAJOBS on application status for the purposes of sharing this information through the USAJOBS Application Status interface.

Information on new hires can be sent by the subscribing agency to the employee record in the Electronic Official Personnel Folder (eOPF) system. The eOPF system maintains the official digital imaged version of a Federal employee's personnel folder. USA Staffing and USA Hire share application data and assessment scores necessary to administer USA Hire's online competency-based assessments. OPM's Reasonable Accommodation team uses FootPrints to manage the process of tracking and processing applicant's claims for Reasonable Accommodation in support of the USA Hire program.

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 USA Staffing and use it for an unauthorized purpose.

Mitigation: This risk is mitigated using access controls that restrict the ability to retrieve data based on an individual's authorization and access permissions that are built into the system. The system can be uniquely configured by agencies to maintain access roles that restrict and grant access to information and functionality to support the unique business process needs of a subscribing agency.



Privacy Risk: There is a risk that the information in USA Staffing 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 (through access controls built into USA Staffing) only to authorized and registered agency users. When agency users are authorized to access USA Staffing, they are informed regarding the appropriate use of the information it contains and agree to adhere to the Rules of Behavior. USA Hire program staff have access to USA Staffing to adjudicate Reasonable Accommodation requests.

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.

Once applicants and new hires are routed from USAJOBS to USA Staffing, USA Staffing provides notice to individual applicants through the Privacy links available in the footer of USA Staffing's applicant and new hire interfaces. Agencies must make an alternative application method available to applicants. Information on that process is included in the job announcement.

In addition to the notice provided to applicants when they begin the application process, this PIA also serves as notice concerning USA Staffing and its collection, maintenance and use of their information. Likewise, the SORNs referenced in Section 1.2 provide notice to individuals concerning the purpose for collecting types of records and the routine uses for that information.

When applicants request Reasonable Accommodation for USA Hire assessments, FootPrints sends an automatic email that explains what is needed to adjudicate an RA claim, the deadline for submitting documentation, and other relevant information.



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

When applicants sign in to USAJOBS, they are provided with a link to the login.gov Privacy and Security information site

(<https://www.login.gov/policy/>) and consent to the online Full Terms and Conditions of Use. USAJOBS provides a link to their privacy policy in the website footer: <https://www.usajobs.gov/Help/Privacy/>. USAJOBS also publishes their terms and conditions in their Help system: <https://www.usajobs.gov/Help/terms-and-conditions/>.

For vacancies that require USA Hire online assessments, the applicant is informed that information will be shared with USA Hire. Applicants who do not want to consent to the outlined uses may choose not to apply.

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 through the Privacy Act Statement, Full Terms and Conditions of Use, and the Privacy Policy that is provided to the applicants when they sign into USAJOBS and send their application to USA Staffing.

Section 5.0. Data Retention by the Project

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

In accordance with NARA Records Schedule Number N1-478-11-004, item 2, and the Delegated Examining Operations Handbook (DEOH), information for applicants is retained for three years after the closing date of the job opportunity announcement.

Help desk information is maintained according to GRS 5.8, Item 010 - Technical and administrative help desk operational records. The records are



to be destroyed one year after resolved, or when no longer needed for business use.

5.2. Privacy Impact Analysis: Related to Retention

Privacy Risk: There is risk that the information in USA Staffing will be retained for longer than is necessary to fulfill the business need for the information.

Mitigation: This risk is mitigated because USA Staffing adheres to the records retention schedule and DEOH and electronically deletes information three years after the closing date of the announcement.

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.

All information that an applicant provides to USA Staffing is accessible to the relevant agency users who posted the job opportunity announcement for which the applicant applied and who are responsible for the activities associated with filling that vacancy.

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

USA Staffing provides access to applicant information to appropriate agency users consistent with the purposes for which that information was collected. These purposes include those outlined in the relevant SORNs referenced in Section 1.2. For example, OPM GOVT-5 Recruiting, Examining, and Placement Records notes that the records are used to consider the applications of individuals who have applied for Federal service, to make determinations of qualifications, and to rate and rank applicants applying for the same or similar positions. OPM GOVT-5 specifically notes that



information will be provided to relevant Federal agencies for employment consideration and this use is reflected in the SORN's routine uses.

In addition, OPM/ GOVT-6 Personnel Research and Test Validation Records covers the assessment tools that USA Staffing and the subscribing agencies employ in their talent acquisition process. These records are used and shared with the appropriate subscribing agency consistent with the stated purpose to construct, analyze, and validate written tests and other assessment instruments used in the selection process.

OPM / GOVT-7 Applicant Race, Sex, National Origin, and Disability Status Records covers the information in the Applicant Flow Data (AFD) referenced in Section 3. Agency users who have access to this information are required to comply with the stated purpose to implement and evaluate relevant agency programs and determine any adverse impacts in the selection process. Consistent with the SORN, Applicant Flow Data is deidentified, so applicant identities and their race, sex, national origin, or disability responses do not accompany their application data. Selecting officials do not have access to this information.

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

All subscribing agencies are subject to the government-wide SORNs referenced in Section 1.2 and are constrained in their re-dissemination of information based on their terms. In addition, agency users are subject to the Rules of Behavior that outline appropriate handling and use of USA Staffing information. Agency users with access to AFD are subject to additional Rules of Behavior (i.e., they may not have access to review, certify or, select applicants for job vacancies in USA Staffing). The AFD Rules of Behavior state the data will only be disclosed in connection with the performance of official duties solely for authorized purposes and data will only be disclosed in the aggregate 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 USA Staffing data are managed by the USA Staffing Program Office and recorded by the USA Staffing User Support Branch.

6.5. Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is risk that the information properly shared from USA Staffing outside of OPM will be misused by the recipients.

Mitigation: USA Staffing mitigates this risk by requiring all agency users to agree to Rules of Behavior that outline the appropriate use of the information and by also providing users with the System Use Notification, Privacy Policy, and Full Terms and Conditions of Use. Agency users sign the Rules of Behavior annually and are notified that unauthorized user attempts or acts to accrue resources for unauthorized use, or otherwise misuse this system are strictly prohibited and may result in criminal, civil, or administrative penalties. In addition, each subscribing agency agrees to operate in accordance with USA Staffing's Statement of Service.

Section 7.0. Redress

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

Applicants arrive at USA Staffing through a single sign-on at USAJOBS.gov. Once applicants have created an account and sign in through USAJOBS, they can access their information in USA Staffing. In addition, each SORN identified in Section 1.4 provides individuals with information concerning how to request particular types of records that OPM or other Federal agencies may have about them.



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

Applicants can update their profile information online via USAJOBS and those corrections are inherited by USA Staffing in the process of updating an existing application or creating a new application. In addition, applicants may contact the agency representative identified in a job opportunity announcement and request changes to their information once the announcement has closed on USAJOBS. The USA Staffing Help Desk also responds to applicant requests related to erroneous or inaccurate information and refers those applicants to the appropriate agency representative. Applicants who move to the onboarding process can update their information online in the new hire interface. In addition, each SORN identified in Section 1.4 provides individuals with information concerning how to request that erroneous or incomplete information be amended.

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

USA Staffing has an online help tool (<https://help.stage.usastaffing.gov/Apply/index.php?title=Applicant>) that instructs applicants how to obtain assistance, as well as a help desk that can assist applicants who have questions concerning access to and correction of their information. In addition, individuals receive information from this PIA and the SORNs referenced in Section 1.2.

7.4. Privacy Impact Analysis: Related to Redress

Privacy Risk: There is a risk that individuals will not be able to amend incorrect or incomplete information, impacting the hiring decisions and the utility of USA Staffing.

Mitigation: This risk is mitigated by providing applicants with direct access to USA Staffing and the ability to ensure all data is accurate, relevant, and up-to-date as well as access to other resources, such as the USA Staffing Help Desk and subscribing agency personnel to provide assistance.



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?

USA Staffing captures sufficient information in audit records to establish what events occurred, the sources of the events, and the outcomes of the events. These records are reviewed by staff in the USA Staffing Program Office for indications of inappropriate or unusual activity. The USA Staffing Program Office investigates suspicious activity or suspected violations, reports findings to appropriate officials, and takes necessary actions.

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

Every agency user is required to accept the USA Staffing Rules of Behavior on an annual basis and is also required to take the annual privacy and security training offered by their respective 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?

Each subscribing agency determines which individuals within their organization will be an authorized user of USA Staffing and assumes responsibility for ensuring they choose the appropriate agency users. System access to USA Staffing is provided on an annual basis. Only authorized users may obtain access to USA Staffing.

8.4. How does the project review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within OPM and outside?

The USA Staffing Program Office grants annual access to USA Staffing subject to a Statement of Service and associated Interagency Agreement. In addition, agency users electronically sign the agreement that contains the privacy and security policies for USA Staffing and the Rules of Behavior for all information types.



Responsible Officials

Bridget Dongarra

USA Staffing® Program Manager

Approval Signature

Singed Copy on file with the Chief Privacy Officer

Kellie Cosgrove Riley

Chief Privacy Officer