



Privacy Impact Assessment for  
**Presidential Management Fellows  
Program Talent Management System**

September 27, 2022

**Contact Point**

Arianne Gallagher-Welcher  
Director

Presidential Management Fellows Program

**Reviewing Official**

Kellie Cosgrove Riley  
Senior Agency Official for Privacy



## **Abstract**

The Presidential Management Fellows (PMF) Program is the Federal government's flagship leadership recruitment and development program for advanced degree candidates. Created through Executive Order in 1977, the PMF Program is designed to attract to the Federal service outstanding men and women from a variety of academic disciplines and career paths from all segments of society, who have a clear interest in, and commitment to, excellence in the leadership and management of public policies and programs.

The PMF program is supported by the Talent Management System (PMF TMS). The system is hosted and managed by USA Learning via an Interagency Agreement and is the back-end system that runs the application, adjudication, recruitment, and financial management functions of PMF Program Operations. This Privacy Impact Assessment is being conducted because the information collected, maintained, or disseminated by the PMF TMS includes personally identifiable information.

## **Overview**

The Presidential Management Fellows (PMF) Program was established by Executive Order in 1977 to attract to the Federal service outstanding men and women from a variety of academic disciplines and career paths from all segments of society, who have a clear interest in, and commitment to excellence in the leadership and management of public policies and programs. By drawing graduate students from diverse social and cultural backgrounds, the PMF Program provides a continuing source of trained men and women to meet the future challenges of public service.

The PMF Program recruits thousands of recent and/or current graduates each year from graduate schools globally and across all academic disciplines. Eligible applicants bring invaluable skills and experiences to Federal agencies at the cutting edge of their respective fields—from public policy to STEM



(Science, Technology, Engineering, Mathematics), finance, business, public health, international affairs, law, cybersecurity, and many more.

The PMF Program Office conducts an annual online application and rigorous assessment process, covering the following competencies: Attention to Detail, Flexibility, Integrity/Honesty, Interpersonal Skills, Oral Communication, Reasoning, Self-Management, and Supporting Diversity. After applicants complete the online assessment and submit documentation to prove eligibility to participate in the program, the pool is then narrowed from several thousand Applicants to a smaller group of Semi-Finalists, who then participate in a Fellows Structured Interview (FSI) process over the phone with a small panel of interview assessors. Then the group of Semi-Finalists is narrowed down to a group of Finalists. All Finalists are pre-qualified at the GS-9 level based on their advanced degree, and agencies have the option to initially appoint them at the GS-9/11/12 (or equivalent).

Agencies post appointment and rotational opportunities throughout the year to OPM's PMF Talent Management System (TMS). Current Finalists have one year from when they are selected to find a placement at a Federal agency. Hiring officials can work with their Agency PMF Coordinator to search the database of Finalists, review their resumes, and encourage them to apply for jobs. When an agency hires a PMF Finalist, they reimburse the PMF Program Office a fee for each Fellow hired, as the PMF Program is a cost-recovery organization and receives no appropriated funds.

Fellows are required to receive 80 hours of formal interactive training each year (for a total of 160 hours) and participate in a 4 to 6-month developmental assignment during their two-year fellowship. Agencies can also sponsor Fellows for optional rotational assignments. Additionally, Fellows have access to our PMF Leadership Development Program (PMF LDP), which provides several hours of experiential leadership training toward fellowship requirements. They also become part of a vast network of current PMFs and over 10,000 PMF Alumni.



The PMF TMS is the critical back-end system for the Presidential Management Fellows Program and allows for the automation and streamlining of several key functions and operations required to run the PMF Program pursuant to Executive Order 13562, "Recruiting and Hiring Students and Recent Graduates" and regulations found in 5 CFR 213.402(c), 5 CFR 302, and 5 CFR 362, Subparts A and D. The PMF Program Office owns the PMF TMS within OPM's Center for Leadership Development (CLD), Human Resources Solutions.

The PMF TMS allows the PMF program office to run the application and certification process online annually, which attracts on average 6,000-9,000 applicants a year, host the PMF appointment opportunities available by agencies, and allow Finalists to apply to those positions directly on the system. The PMF TMS also provides a platform for Agency PMF Coordinators to post PMF positions, review PMF application information, appoint Finalists into PMF positions, and submit necessary documentation to pay the required PMF placement fee for each PMF hire.

The information that PMF TMS collects, uses, disseminates, and maintains is applicant information, to include name, last four digits of their Social Security number, home address, email address, phone number, assessment and evaluation data, resume, school transcripts, documents related to veterans' preference or reasonable accommodations, voluntary information related to demographics (race, sex, national origin, disability status), and the applicant-created user account information; information on agency appointment opportunities; user account information for agency points of contact, to include names, email address, and phone number; appointment information about Fellows and whether they successfully complete the program and convert into a permanent position; contact information for the Fellow's supervisor; and information about the status of agencies' fee payments.

Agency points of contact are given role-restricted user accounts to input agency job and PMF appointment information into the system. Both the



agency points of contact and the PMF program staff enter information about agencies' fee status and information about whether Fellows successfully complete the program and convert into a permanent position. When Fellows successfully complete their Fellowship their status changes to Alumni, and their contact information is kept on record for emails (they can opt in or out of receiving these communications).

Agency points of contact have access to their agency's appointment data along with the list of Finalists each year and their documentation to review to determine if they meet the qualifications for the specific positions they are recruiting for. Fellows can log in and view their appointment information, update their contact information, and view appointments and rotational opportunities posted by agencies.

The PMF TMS is FEDRAMP moderate certified, and data is protected through user-based access accounts. Security and Privacy protections are included in the annual Interagency Agreement with OPM's USALearning program to host and maintain the system. All users are required to use two-factor authentication to access the system.

A general description of the roles and functions of the PMF TMS can be found on our website at [www.pmf.gov](http://www.pmf.gov).

## **Section 1.0. Authorities and Other Requirements**

### **1.1. What specific legal authorities and/or agreements permit and define the collection of information by the project in question?**

The legal authorities that govern the PMF Program and the PMF TMS are as follows: Executive Order 13562, Recruiting and Hiring Students and Recent Graduates, which requires that OPM establish the eligibility requirements and minimum qualifications for the program and establish a process for assessing eligible individuals for consideration for appointment as PMFs; 5



CFR 213.402 (c) (excepted service); 5 CFR 302 (Veteran's preference); 5 CFR 362, Subparts A (Pathways program) and D (PMF program); EEO Management Directive 715: EEO Reporting Requirements for Federal Agencies (Equal Employment Opportunity Commission guidance to federal agencies for their use in establishing and maintaining effective programs of equal employment opportunity under Section 717 of Title VII of the Civil Rights Act of 1964 (Title VII) and Section 501 of the Rehabilitation Act of 1973 (Rehabilitation Act)).

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

The applicable SORN for the records in this system is OPM/Central-11, Presidential Management Fellows (PMF) Program Records.

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

An OPM System Security Plan has not been developed specific to the PMF TMS. The USA Learning CSP maintains a FedRAMP templated System Security Plan for the USA Learning Federal Learning Enclave on which the PMF TMS resides. The FedRAMP templated System Security Plan with control implementations in support of the PMF TMS is reviewed on an annual basis with the controls assessed annually by a FedRAMP authorized third-party assessor.

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

The PMF Program is in the process of reviewing retention schedule N1-146-89-002 with the Agency Records Officer to determine whether updates are required.



**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 PMF program is currently evaluating the requirements of the PRA with respect to the PMF TMS.

## **Section 2.0. Characterization of the Information**

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

The information that PMF TMS collects, uses, disseminates, and maintains is applicant information, to include name, last four digits of their Social Security number, home address, email address, phone number, assessment and evaluation data, resume, school transcripts, documents related to veterans' preference or reasonable accommodations, voluntary information related to demographics (race, sex, national origin, disability status), and the applicant-created user account information; information on agency appointment opportunities; user account information for agency points of contact, to include names, email address, and phone number; appointment information about Fellows and whether they successfully complete the program and convert into a permanent position; contact information for the Fellow's supervisor; and information about the status of agencies' fee payments.

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

Applicants create a user account in the PMF TMS and enter their information directly into the system. Agency points of contact also create user accounts in the system and provide their names, email addresses, and phone numbers. Both the agency points of contact and the PMF program staff enter information about agencies' fee status and information about whether



Fellows successfully complete the program and convert into a permanent position.

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

Information from the Department of Education accredited institution database is pulled annually to determine the drop-down list of schools and universities from which applicants can pick to include as part of the application process.

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

The system does not independently verify the information submitted but users must self-certify/confirm that the information they submit is accurate and up to date to the best of their knowledge; they are subject to civil, criminal, or administrative penalties if they falsify information. User controls are in place on the system to certify that only administrative users can access and modify specific data fields and some data fields contain restrictions, such as choosing a valid United States state name from a list or limiting fields to a defined number of characters. During the adjudication process, the PMF program does review all an applicant's information to confirm accuracy and make any necessary adjustments.

**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 selection decisions.

**Mitigation:** The risk of collecting inaccurate information is mitigated via field restrictions and requiring that the user validate/confirm that the information submitted is accurate. Generally, applicants have an interest in ensuring that the information they provide is accurate. The risk that applicants will provide falsified information to obtain more favorable hiring decisions is mitigated by providing them notice that they must fill out the





site completely and truthfully and warning them about the consequence of knowingly falsifying or concealing a material fact.

**Privacy Risk:** There is a risk that the PMF Talent Management System will collect more information than is necessary to achieve the business purpose of the program.

**Mitigation:** This risk is mitigated by identifying for applicants whether the requested information is required or optional but cannot be fully mitigated because applicants are permitted to upload documents and those may contain information not required by the PMF Program or the participating agencies. Applicants are cautioned, however, not to provide sensitive information unless agencies or the PMF Program Office specifically request it after they become Finalists.

## **Section 3.0. Uses of the Information**

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

The PMF Program uses the information in the PMF TMS to operate a centralized application process that collects and assesses applicants and certifies a list of Finalists for agencies to hire as Fellows. Information is collected and used to allow Finalists to apply for PMF positions across government and contact agency representatives for questions related to those job opportunities. Information is also used to track appointments and certifications to provide information about leadership development opportunities throughout the fellowship period.

The information in the system is used by the PMF Program personnel to determine basic program eligibility and to evaluate applicants in a structured assessment process conducted by OPM; to group the interested individuals into various categories (e.g., Candidates, Applicants, Eligibles, Ineligibles, Semi-Finalists, Finalists, Non-Selectees, Fellows, Former Fellows, and Alumni) and make a final determination as to those applicants who will be



referred (as Finalists to become Fellows) to participating Federal Agencies for employment consideration; for program evaluation functions to determine the program's effectiveness and to improve program operations; to facilitate interaction and communication between PMF Program participants and alumni; to track PMF appointments, certifications, conversions, reappointments, withdrawals, resignations, extensions, and terminations; to track agency reimbursements for PMF appointments; to schedule and track PMF participation in Program-sponsored training and development events (e.g., leadership development, forums, graduation); and to track contact information of Applicants (at all stages), Agency PMF Coordinators, PMF supervisors, Agency HR staff, Pathways Programs Officers, and other relevant stakeholders.

**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.**

The system is used to track the number of appointments each year and what types of positions Finalists are placed into to help determine how best to work with agencies to place as many Finalists into fellowship positions as possible. The PMF Program Office analyzes application data each year to identify the most common mistakes made on applications so that they can advise upcoming potential applicants on what mistakes to avoid. The PMF Program Office also searches the list of Finalists by academic background and other criteria to help match them with agencies looking for their skillsets. The office also looks at conversion data to see which agencies have the highest conversion and reappointment rates to help identify any issues and help them get resolved. Application and assessment data is analyzed to help identify any trends or issues that may need to be resolved in the next application cycle. Agency hiring projections are solicited via an annual Workforce Planning Survey and data show agencies their projections against available Finalists and appointments. Analysis on applicant flow data is also conducted in accordance with EEOC's Management Director 715 to examine



the fairness and inclusiveness of the PMF Program's recruitment efforts and determine if assessment practices should be modified to help eliminate barriers to equal employment opportunity.

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

Business operations employees of OPM and CLD upload financial forms onto the system once signed and executed. The PMF Program contracts with USA Learning to host and maintain the system as part of the Knowledge Portal of OPM applications.

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

**Privacy Risk:** There is a risk that authorized individuals may access the information in the PMF TMS 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 maintains access roles that restrict and grant access to information and functionality to support a subscribing agency's unique business process needs and user type. All users are required to use two-factor authentication to access their user accounts. When agency users are authorized to access the system, they are informed regarding the appropriate use of the information it contains and agrees to adhere to the Rules of Behavior. Audit logs are tracked and maintained to monitor user access.

**Privacy Risk:** There is the risk that the information in the PMF TMS will be used by unauthorized users 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 the PMF TMS, only to authorized and registered agency users. When agency users are authorized to access the system, they are



informed regarding the appropriate use of the information it contains and agrees to adhere to the Rules of Behavior.

## **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.**

Notice is provided to all applicants before they apply to the program. Notice is also provided to all agency users who request access to the system to perform their roles and responsibilities as part of the program.

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

Applicants are able to provide consent, or decline to provide consent, to subscribe to automated messages from the PMF TMS, and the PMF Program Office; permit OPM to share their application information with other Federal agencies; be publicly identified on the PMF website if selected as a Finalist and if appointed as Fellow; and to have OPM share any results from surveys, career assessments, and questionnaires. Those Fellows who are certified in completing the program requirements, instantly become members of the PMF Alumni Community, and are able to consent, or decline to provide consent, to be contacted about alumni opportunities. At the application phase, Applicants are informed that providing demographic information that is part of the application is voluntary and does not affect the outcome of their application to the program.

### **4.3. Privacy Impact Analysis: Related to Notice**

**Privacy Risk:** There is the 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 provided to the



applicants when they sign into the PMF TMS. These statements are also available on our PMF website, including a copy of our System of Records Notice. This PIA also provides notice concerning the collection and use of the information in the system. is also reviewed on a regular basis by the OPM Privacy Office.

## **Section 5.0. Data Retention by the Project**

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

The records in the system are currently being maintained until NARA-approved records schedule (N1-146-89-002) is reviewed and updated as necessary.

### **5.2. Privacy Impact Analysis: Related to Retention**

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

**Mitigation:** This risk is currently not mitigated as the records must be maintained until an updated schedule is in place. The PMF Program and the Agency Records Officer are working to mitigate this risk by reviewing and updating the current schedule.

## **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.**

Agencies participating in the PMF Program have access to the system based on user controls that allow them to view the list of Finalists and their resume information, submit job postings, and review the resumes of Finalists who have applied to their position. They also can input workforce planning data



related to their agency and record PMF appointments and status updates for their agencies' Fellows. Information is accessed by providing user accounts based on their role in the program.

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

Any disclosure of information outside of OPM is done only consistent with the Privacy Act, such as pursuant to an applicable routine use outlined in the OPM/Central-11 SORN.

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

Information is shared outside of OPM to agency points of contact who have user accounts based on the agency's role in administering the program at their agency. They are instructed concerning the proper use and dissemination of the information.

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

The system logs track access to individual access to the records contained within the system and user access roles define the purpose for which the records are collected.

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

**Privacy Risk:** There is a risk that the recipients of information will misuse or mischaracterize the information properly shared from the PMF TMS outside of OPM.

**Mitigation:** This risk is mitigated by sharing only the minimum level of data authorized to be shared outside of OPM consistent with the Privacy Act, such as pursuant to an applicable routine use the OPM/Central-11 SORN. The PMF Program implements checks and balances when reviewing and disseminating authorized information outside of OPM to ensure that the appropriate level of information is shared.



## **Section 7.0. Redress**

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

Certain records in this system are exempt from the access and amendment provisions of the Privacy Act.

Individuals who wish to gain access to their non-exempt records should direct such a request in writing to the system manager. Program participants must furnish the following information for their records to be located and identified: a. Full Name at Time of Application, b. Maiden Name (if applicable), c. Home Address referenced at Time of Application, d. Advanced Academic Degree referenced at Time of Application, and e. Year Applied to Program. Individuals must also comply with OPM's Privacy Act regulations regarding verification of identity and access to records (5 CFR 297).

In addition, program participants and agencies who wish to review or modify appointment or status information in the system can contact the PMF Program Office at [pmf@opm.gov](mailto:pmf@opm.gov).

This system contains testing and examination materials used solely to determine individual qualifications for appointment or promotion eligibility in the Federal service. The Privacy Act at 5 U.S.C. 552a(k)(6), permits an agency to exempt all such testing or examination material and information from specific provisions of the Act when disclosure of the material would compromise the objectivity or fairness of the testing or examination process. OPM has claimed exemptions from 5 U.S.C. 552a(d) requirements, which relate to access to and amendment of records, for any such testing or examination materials in the system.

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

Certain records in this system are exempt from the access and amendment provisions of the Privacy Act.



Program participants wishing to request amendment of their non-exempt records should contact the OPM PMF system manager and must furnish the following information for their records to be located and identified: Full Name at Time of Application, Maiden Name (if applicable), Home Address referenced at Time of Application, Advanced Academic Degree referenced at Time of Application, and Year Applied to Program. Individuals must also comply with OPM's Privacy Act regulations regarding verification of identity and amendment of records (5 CFR 297).

In addition, Fellows and agency points of contact who wish to review or modify inaccurate or erroneous appointment or status information in the system can contact the PMF Program Office at [pmf@opm.gov](mailto:pmf@opm.gov).

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

Program participants are notified of who they can contact regarding their application, applicant information, and status in the PMF Program (e.g., send an email to [pmfapplication@opm.gov](mailto:pmfapplication@opm.gov)). We also publish our SORN online on our website. We direct users who wish to request information to the SORN for more information. In addition, individuals also can receive notice through this PIA.

### **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 selection and placement decisions as part of the PMF Program.

**Mitigation:** This risk is mitigated by providing applicants with direct access to the PMF application and the ability to ensure all data is accurate, relevant, and up to date as well as access to other resources, such as technical help desk telephone number and PMF Program application email contact and PMF Program staff to assist.





## **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 undergoes regular program audits and review of standard operating procedures.

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

Privacy and security training is provided to all OPM employees and contractors who work with the system annually. Agency users undergo privacy and security training as well based on their job responsibilities.

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

PMF team administrators are the only ones who can grant user access based on role and responsibilities with the specific user in the program. Access is user-based, and users see only information relative to their role. A query is available on the system to determine how many users are on the system and what access role they have. Those agency users serving as Agency PMF Coordinators may grant, modify, or deactivate other agency users associated with their permission level (e.g., Agency Hiring Officials, Agency HR Staff, and other Sub-Agency PMF Coordinators). All agency users must acknowledge and adhere to the Full Terms and Conditions of Use. Coordinators can query a list of users at any time in the PMF TMS.

### **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 information sharing agreements, MOUs, and new uses and access to the information in the system are evaluated by relevant OPM stakeholders.

Only those Federal agencies in the competitive service of the Executive Branch that have an approved Pathways MOU (or those Federal agencies in



the excepted service and Legislative Branch that have an approved PMF MOA) as outlined under 5 CFR §362.104(a) may designate an official Pathways Programs Officer and Agency PMF Coordinator (if it so chooses to participate in the PMF Program). The PMF Program Office manages the Agency-wide PMF Coordinator users, who manage their agency users.

## **Responsible Officials**

Arianne Gallagher-Welcher, Director, PMF Program

William Peratino- Director, USALearning

## **Approval Signature**

Signed Copy on file with the Senior Agency Official for Privacy

Kellie Cosgrove Riley  
Senior Agency Official for Privacy