



Privacy Impact Assessment for

## USA Survey Ex

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### **Contact Point**

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## **Abstract**

USA Survey Ex is an on-line survey, cloud-based platform used to collect and report on information about workplace perceptions, experiences, capabilities, and performance from Government employees or people with whom they interact. USA Survey Ex is the transition of the existing USA Survey system to an updated and re-engineered cloud-based solution utilizing the FedRAMP authorized Medallia Gov Cloud. This PIA is being conducted because USA Survey Ex collects, maintains, and uses personally identifiable information.

## **Overview**

USA Survey Ex is used by Organizational Assessment (OA), which is part of the Assessment and Evaluation Branch (AEB), Human Resources Strategy and Evaluation Solutions (HRSES), Human Resources Solutions (HRS), U.S. Office of Personnel Management (OPM) to collect and report on information about workplace perceptions, experiences, capabilities, and performance from Government employees or people with whom they interact. The information collected through the system helps agencies maximize their performance and recruit, retain, and honor a world-class workforce.

USA Survey Ex is used to conduct electronic surveys and contains information related to human capital and workforce planning, customer service, program management and management improvement. The system also contains reporting mechanisms that allow agency customers to review their survey results. USA Survey Ex can administer many surveys simultaneously and can administer a variety of survey types. The most frequently administered surveys are work environment perception surveys, 360-degree leadership surveys, and customer satisfaction surveys. Surveys typically include scaled responses and free text items related to leadership assessment, needs assessment, competency gap analysis, job analysis, customer experience, organizational climate, employee engagement, change



management, program evaluation, and/or related topics along with self-reported demographics such as age, gender, race, ethnicity, tenure, pay category (e.g., GS, SES), pay grade, supervisory status, job category (e.g., professional, administrative, clerical), and agency subcomponent.

A typical transaction in the system would involve a Government employee or someone they interact with completing a voluntary online assessment. The customer agency point of contact provides names and email addresses that are used to address survey invitation emails to specific individuals and assign each person a single-use logon to access the survey. For 360-degree leadership surveys and other multi-rater surveys, names and email addresses of potential survey takers may also be provided by the person being evaluated. Survey takers are sent an email to respond to a specific survey and all individuals who receive a survey invitation and access the survey are provided notice via a Privacy Act statement that provides information regarding why the information is being collected and how it will be used. All individuals who receive a survey invitation are informed that completing the survey is completely voluntary. Additionally, survey takers who receive a survey notification email can ask to be removed if they do not want to participate. As survey takers complete the survey, partially completed and completed surveys are stored within the USA Survey Ex database for analysis. In most cases, survey takers enter a survey via a unique, single use link but there are some specific cases where a common generic link may be used.

The survey system contains two modules: Surveys and Reporting. The survey module is used by system administrators to create and administer surveys, and the reporting module is used to present aggregated results to customers.

OA protects the data in the online system by utilizing password-protected individual administrative user accounts. Authentication to USA Survey Ex is accomplished via Single Sign-On (SSO) for USA Survey Ex Administrators and technical support. Reports and data exported from the survey system



are stored on the OPM network in limited-access folders. Access to reports generated using the USA Survey Ex reporting module is limited to authorized customer users as specified in an Interagency Agreement with HRS. There are no internal or external interconnections with the USA Survey Ex system.

## **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's Human Resources Strategy and Evaluation Solutions performs assessments and related consultation activities for Federal agencies on a reimbursable basis. The USA Survey Ex system is used as part of those services and is authorized by various authorities, including: 5 U.S.C. §§ 1101 note, 1103(a)(5), 1104, 1302, 3301, 3302, 4702, 4703, and 7701 note; Executive Orders 12862, 13715, 13197, 10577; Section 1128 of the National Defense Authorization Act for Fiscal Year 2004, Public Law 108-136; and 3 CFR, 1954-1958 Comp.

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

The OPM GOVT-6, Personnel Research and Test Validation Records, SORN applies to the information in USA Survey Ex.

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

Yes. The USA Survey Ex System Security Plan was approved by the Authorizing Official on October 26, 2020. As USA Survey Ex is a new system, specific security control implementations are currently being developed. An Interim Authority to Test (IATT) was issued on August 9, 2020 for a period of 120-days.



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

The NARA Records Schedule is DAA-0478-2017-0012.

**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 relevant OMB control numbers are 3206-0236, 3206-0252, and 3206-0253.

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

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

The system contains information related to human capital and workforce planning, customer service, program management and management improvement. This includes scaled responses and free text items related to leadership assessment, needs assessment, competency gap analysis, job analysis, customer experience, organizational climate, employee engagement, change management, program evaluation, and/or related topics along with self-reported demographics such as age, gender, race, ethnicity, tenure, pay category (e.g., GS, SES), pay grade, supervisory status, job category (e.g., professional, administrative, clerical), and agency subcomponent.

For approximately 75% of the assessments, the respondent/record subject is a Federal employee. The remaining 25% of respondents are contractors, private sector employees, or members of the public that are customers of a Federal agency.

Names and email addresses provided by agency customer points of contact are used to address survey invitation emails to specific individuals and assign each person a single-use logon to access the survey. For 360-degree



leadership surveys and other multi-rater surveys, names and email addresses of potential survey takers may also be provided by the person being evaluated. The surveys themselves typically do not collect names or email addresses, but names/email addresses may be entered into the system during survey administration to send invitations and/or track participation. These names and email addresses are stored separately from the survey responses. The names and email addresses are not disclosed in reporting and generally cannot be traced back to any single individual respondent. When survey responses are submitted, the respondent's name and email address are decoupled from the responses and responses are stored with the other survey responses in a combined de-identified data set. Names and email addresses are not part of the survey data file used for analysis and record-level identifiable information is not shared with agency customers. For 360-degree leadership surveys and other multi-rater surveys the name of the person being evaluated and his/her identifiable record-level responses are provided to the person being evaluated along with aggregated, de-identified responses from others evaluating the individual. The supervisor's responses, while not specifically identified by name (shown as "Supervisor"), will be known to the person being evaluated. Approximately 75% of the email addresses are Federal government work email addresses, approximately 15% are contractor or private sector work email addresses, and about 10% are personal email addresses.

All PII maintained within the system is encrypted within the database using FIPS 140-2 approved encryption methods.

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

For most surveys, names and email addresses of potential survey-takers are provided by customer agency points of contact in order to send survey invitations. These names and email addresses are stored separately from the survey responses. For 360-degree leadership surveys and other multi-rater surveys, names and email addresses of potential survey takers may also be



provided by the person being evaluated. These names and email addresses are also stored separately from the survey responses.

Survey responses are collected directly from individuals via online surveys.

**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 Survey Ex does not use information from commercial sources or publicly available data.

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

Individuals entering data into the system are responsible for ensuring that the information they put into the system is accurate. Additionally, the project manager responsible for the project reviews information for accuracy. Undeliverable emails generate a bounce back message showing the email as undeliverable. These email addresses are returned to the source (e.g., agency point of contact or person being evaluated by the 360-degree leadership survey) for review, and correction if possible.

Project managers for each assessment project manually review data collected for anomalies.

**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 respondents and this may result in inaccurate survey results.

**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 Survey Ex 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 Survey Ex does not otherwise validate the information that is collected from the respondents. The risk that



respondents will provide falsified information in an effort to obscure results is mitigated by providing them with notice to fill out the site completely and truthfully.

**Privacy Risk:** There is a risk that USA Survey Ex will collect more information than is necessary, including unnecessary PII.

**Mitigation:** USA Survey Ex mitigates this risk by allowing agencies to modify the customized PII requests such that only PII relevant to the specific type of survey in use is requested. Applicants are also notified as to whether requested information is required or optional. Respondents are cautioned not to provide PII unless it is specifically requested.

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

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

The information in USA Survey Ex is used by our customers to assess organizational culture and climate, customer satisfaction, leadership competencies, causes of turnover, and/or other organizational needs. The surveys administered help government agencies meet their missions and span the full spectrum of human capital management solutions, including staffing, leadership development, strategy, restructuring, individual assessment for selection and promotion, leadership assessment for development, customer satisfaction, and organizational and program assessment. The surveys provide information about organizational effectiveness and performance of Federal Agencies and/or the quality and effectiveness of Federal programs.

The intended uses of names and email addresses in USA Survey Ex are to address survey invitation emails to specific individuals and assign each person a single-use logon to access the survey.





The names and email addresses are not disclosed in reporting and generally cannot be traced back to any single individual respondent by any external user of the system. Internal administrator users of the system may use the name and/or email address of the respondent to diagnose and correct problems encountered while trying to complete a survey (e.g., resetting passwords, resolving log-on problems). Names and email addresses are not part of the survey data file used for analysis.

**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.**

USA Survey Ex 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?**

Other program offices within Human Resources Solutions may be authorized to administer related assessments using USA Survey Ex. These assessments are administered by assigned administrative users using a password-protected individual administrative user account. These assessments are independent projects that do not involve data sharing.

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

**Privacy Risk:** There is a risk that an unauthorized person will access the information in USA Survey for an unauthorized purpose or that an authorized person will access information for an unauthorized purpose. There is also a risk that survey responses will be inappropriately linked to a particular person such that the responses are attributable when they should not be.

**Mitigation:** This risk is mitigated through the use of 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 the unique business process needs of a subscribing agency.

**Privacy Risk:** There is risk that the information in USA Survey Ex 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 Survey Ex, only to authorized and registered agency users. When agency users are authorized to access USA Survey Ex, they are informed regarding the appropriate use of the information it contains and agree 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.**

Individuals do not receive notice prior to customer agency points of contact providing names and email addresses to the system. The names and email addresses are used to address survey invitation emails to specific individuals and assign each person a single-use logon to access the survey. Those individuals who receive a survey invitation and access the survey are provided notice via a Privacy Act statement that provides information regarding why the information is being collected and how it will be used. Notice regarding the collection and use of individuals' information is also provided via the SORN referenced in Section 1.2 and this PIA. For most surveys, names and email addresses of potential survey takers are provided by customer agency points of contact in order to send survey invitations. These names and email addresses are stored separately from the survey responses. For 360-degree leadership surveys and other multi-rater surveys, names and email addresses of potential survey takers may also be provided by the person being evaluated. These names and email addresses are also stored separately from the survey responses.



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

Individuals who receive a survey invitation are informed that completing the survey is completely voluntary. Additionally, survey takers who receive a survey notification email can ask to be removed if they do not want to participate.

#### **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 respondents when they sign into USA Survey Ex to complete a survey. It is also mitigated through publication of the relevant SORN and this PIA.

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

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

The data retention policy is to destroy 10 years after cutoff with cutoff defined as upon completion of the project or last use of the assessment, whichever occurs later. A Standard Operating Procedure (SOP) will be developed to establish procedures ensuring that the data retention schedule will be administered appropriately.

NARA Records Schedule DAA-0478-2017-0012 approved for assessment and evaluation project files states that records are to be destroyed 10 year after cutoff with cut-off defined as completion of the project or last use of the assessment, whichever occurs later. Many of the surveys and data sets contained on USA Survey Ex will be used for assessment development and related research projects and some of the surveys and data sets are used for



longitudinal research so the date retention policy for USA Survey Ex was set in accordance with NARA Records Schedule DAA-0478-2017-0012.

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

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

**Mitigation:** This risk will be mitigated through development of an SOP to establish procedures ensuring that the data retention schedule will be administered appropriately.

## **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.**

Aggregated survey responses are provided to agency customers. For all surveys except 360-degree leadership surveys and other multi-rater surveys neither names and email addresses nor identifiable record-level responses are shared outside of the system. For 360-degree leadership surveys and other multi-rater surveys the name of the person being evaluated and his/her identifiable record-level responses are provided to the person being evaluated along with aggregated, de-identified responses from others evaluating the individual. The supervisor's responses, while not specifically identified by name (shown as "Supervisor"), will be known to the person being evaluated.

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

For all surveys except 360-degree leadership surveys and other multi-rater surveys, aggregated survey responses are provided to agency customers. Neither names and email addresses nor identifiable record-level responses



are shared outside of the system. For 360-degree leadership surveys and other multi-rater surveys the name of the person being evaluated and his/her identifiable record-level responses are provided to the person being evaluated along with aggregated, de-identified responses from others evaluating the individual. The supervisor's responses, while not specifically identified by name (shown as "Supervisor"), will be known to the person being evaluated. This disclosure of aggregated information is consistent with the purpose outlined in the OPM GOVT-6 SORN. In the unusual case where it is necessary to disclose record-level identifiable information, it will only be done so pursuant to an applicable routine use for a purpose compatible with the purpose for which it was initially collected.

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

Interagency Agreements do not place limitations on re-dissemination, as only aggregated survey responses are shared with agency customers, not record-level identifiable information.

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

Only aggregated survey responses are shared with agency customers, not record-level identifiable information.

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

**Privacy Risk:** There is risk that the information in the form of survey results from USA Survey Ex that is shared outside of OPM will be misused by the recipients.

**Mitigation:** USA Survey Ex 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 the System Use Notification, Privacy Policy, and Full Terms and Conditions of Use. Agency users are on notice 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 an Interagency Agreement that they enter into with OPM.

## **Section 7.0. Redress**

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

When a survey-taker receives the survey notification email, they can see the name and email address currently contained in the system. Survey respondents can review all responses to ensure all data is accurate and relevant, and correct their responses if necessary, prior to finalizing and submitting their survey responses. When survey responses are submitted, the respondent's name and email address are decoupled from the responses and responses are stored with the other survey responses in a combined de-identified data set. For 360-degree leadership surveys and other multi-rater surveys the name of the person being evaluated is retained but all other record-level responses are decoupled from the respondent's name and email address and stored with the other survey responses in a combined de-identified data set.

As described above, most survey responses are decoupled from the respondent's identifying information and stored with the other survey responses in a combined de-identified data set data. However, individuals wishing to inquire whether this system of records contains identifiable information about them can contact the system manager. Specific instructions are provided in the OPM GOVT-6, Personnel Research and Test Validation Records, SORN.

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

Incorrect email addresses generate a bounceback email. When bouncebacks are received the customer POC or person being evaluated by the 360-degree leadership survey is notified, and a corrected email address is requested. If a



name in the system is incorrect, the survey taker can use the contact information provided in the notification email to request a correction. Survey respondents can review all responses to ensure all data is accurate and relevant, and correct their responses if necessary, prior to finalizing and submitting their survey responses. When survey responses are submitted, the respondent's name and email address are decoupled from the responses and responses are stored with the other survey responses in a combined de-identified data set. For 360-degree leadership surveys and other multi-rater surveys the name of the person being evaluated is retained but all other record-level responses are decoupled from the respondent's name and email address and stored with the other survey responses in a combined de-identified data set.

As described above, most survey responses are decoupled from the respondent's identifying information and stored with the other survey responses in a combined de-identified data set data. However, individuals wishing to inquire about amending records can contact the system manager. Specific instructions are provided in the OPM GOVT-6, Personnel Research and Test Validation Records, SORN.

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

When a bounceback email indicating an incorrect email address for a survey taker is received, the project manager contacts the agency point of contact or survey participant via email to request a corrected email address for the survey taker. Contact information is also provided in the notification email.

Additionally, OPM GOVT-6 provides notification procedures.

### **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 survey results or potentially reducing the anonymity of responses.



**Mitigation:** This risk is mitigated by providing respondents with the ability to ensure all data is accurate and relevant, prior to finalizing and submitting their survey responses. As described above, most survey responses are decoupled from the respondent's identifying information and stored with the other survey responses in a combined de-identified data set data. However, individuals wishing to inquire whether this system of records contains identifiable information about them can contact the system manager. Specific instructions are provided in OPM GOVT-6, Personnel Research and Test Validation Records, SORN.

## **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 Survey Ex maintains access roles that restrict and grant access to information and functionality to support the business process need. Access to USA Survey Ex is limited to survey project managers and controlled by password-protected individual administrative user accounts.

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

USA Survey Ex project managers complete annual OPM IT Security and Privacy Awareness 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?**

USA Survey Ex manages access to the data based on assigned system roles that restrict and/or grant access to information and functionality to support the business process need of the user. Administrative users (users with access to the system to configure assessments and/or review identifiable respondent data) are limited to the HRS project team.





**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?**

Interagency Agreements (IAAs) are in place with all agency customers who use the system. No additional MOUs regarding the information in the system currently exist. IAAs are reviewed by relevant OPM stakeholders prior to signing and whenever a change in the scope of the agreement is requested.

**Responsible Officials**

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HRS/HRSES/AEB/OA

**Approval Signature**

*Signed Copy on file with the Chief Privacy Officer*

Kellie Cosgrove Riley  
Chief Privacy Officer