Privacy Impact Assessment for

Competency Exploration for Development and Readiness (CEDAR)

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Abstract

The Competency Exploration for Developments And Readiness tool ("CEDAR") is an online competency assessment tool that is used to determine competency proficiency levels to better understand employee competency strengths and gaps. Based on the results of the assessment, targeted training and development opportunities are identified to help close gaps. CEDAR provides employee-specific results of a comprehensive assessment based on supervisor and employee input. Agencies can use the aggregated results of their assessments to support their competency gap analyses, personnel training and development efforts, and to identify the employee competency strengths in an organization. This Privacy Impact Assessment is being conducted because the CEDAR tool will collect personally identifiable information about agency employees and their supervisors.

Overview

The Program Management Improvement Accountability Act (PMIAA) (Pub. L. No. 114-264) requires, in part, that OPM conduct a competency assessment of program managers and project managers throughout the Government to identify competency gaps. Working in consultation with Government agencies and leveraging the expertise of multiple Government-wide Councils, OPM was tasked with reviewing existing Government-wide training and recommending training and development options for the Program Management Improvement Officers (PMIOs).

The Human Capital Framework (HCF) (5 CFR part 250(b)) also requires agencies to execute several functions related to workforce analysis and planning; talent management; and skill gap closure, including using an OPM-designated method to identify gaps. Furthermore, Chief Human Capital Officers are responsible for workforce assessment, strategy, and development and require information to support their efforts.

The Competency Exploration for Developments and Readiness tool ("CEDAR") is an online competency assessment tool that was developed by the Office of Personnel Management's (OPM) Employee Services office to be used to determine competency proficiency levels to better understand employee competency strengths and gaps. Based on the results of the assessment, targeted training and development opportunities can be identified to help close gaps. CEDAR provides employee-specific results of a comprehensive assessment based on supervisor and employee input. Agencies can use the aggregated results of their assessments to support their competency gap analyses, personnel training and development efforts, and to identify the employee competency strengths in an organization.

CEDAR is a key component of OPM's effort to close skills gaps in strategic human capital management across Federal government agencies. Additionally, the use of CEDAR supports reskilling and upskilling efforts that help make the Federal workforce more agile and adaptable to changing needs.

The tool is intended only to inform individual and organizational strategies to address skill gaps and support employee development, and agencies who use the tool are instructed that it may not be used for employee performance ratings or hiring and promotion decisions.

The process for using CEDAR starts with a supervisor registering for an account on the CEDAR homepage by providing their first and last name, work email address, and certification that they are a supervisor and that they understand the tool is only to be used for training and development purposes, not for performance evaluation, hiring, or compensation. Once the supervisor has entered their email address, their agency information automatically populates on the homepage via internal email mapping built into the tool. The individual can then choose drill-down component levels in their agency in the subsequent boxes. The drill-down component level options have been pre-loaded into the tool based on each agency's submission of their hierarchical organizational structure.

Once the supervisor has registered on the homepage, they are taken to their dashboard, where they can add one of their team members and complete the first part of the competency assessment for that team member. The supervisor is required to enter the employee's first and last name, work email, agency component levels, country, duty station, locality pay area, pay plan, pay grade, professional field, and supervisory status in order to begin an assessment for the employee.

After the employee information has been entered, the supervisor is then asked to choose individual competencies for the employee or to choose a pre-approved competency model (a grouping of competencies). The supervisor is required to enter a targeted proficiency level and their assessment of the specific employee's current proficiency levels for each competency. The employee is then required to enter their own assessment of their current proficiency level for each competency chosen by the supervisor, which they must do before being provided with access to the supervisor's targeted and current proficiency level ratings. CEDAR then

calculates the strengths and gaps in proficiency levels for each of the employee's competencies. The full accounting of all ratings, calculated strengths, and gaps for each competency is available to both the supervisor and employee once the assessment process has been completed. This information is internal to the CEDAR system but can be downloaded by the supervisor for the purpose of training and development discussions with the employee.

Data collected by CEDAR from completed competency assessments can be accessed by the OPM SuperAdmin, specified points of contact (POCs) for each agency, and tool administrators for each agency. All data is accessed using an individual's secure login to the CEDAR web application. The OPM SuperAdmin can access all Government-wide data, including names and email addresses, collected by CEDAR for the purpose of administering the tool. Specified agency POCs will have access to their agency's collected data from CEDAR without employee or supervisor identifiable information. They can use this to conduct analyses for use at their agency. Tool administrators at each agency can be assigned at the discretion of the POC for that particular agency. These individuals have access to collected data at their specified component levels but will not have access to any employee or supervisor identifiable information, nor will they have access to full agency data. Any data provided by the OPM SuperAdmin to an agency POC will be cleaned of any personally identifiable information prior to being sent.

Section 1.0. Authorities and Other Requirements

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

5 CFR part 250, subpart B, establishes the Human Capital Framework (HCF), in fulfillment of OPM's responsibilities under 5 U.S.C. 1103(c) and 5 U.S.C. 1402.

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

The applicable SORN is OPM/Central-22, Federal Competency Assessment Records.

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

The System Security Plan for CEDAR is currently being developed. In the meantime, a number of tests and reviews have been conducted, including a Security Impact Analysis and Penetration test, to help ensure the security of the CEDAR tool.

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

Yes. The records collected in the CEDAR tool are General Records Schedule 2.6, Item 010, and are to be retained for three years unless a business use is identified that requires a longer retention.

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 collected by CEDAR is not subject to the PRA because it is collected only from Federal employees and supervisors.

Section 2.0. Characterization of the Information

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

The CEDAR tool collects the following information from Federal agency supervisors and their staff:

a. First and last names

b. Email addresses

c. Agency

d. Agency subcomponent

e. Organizational/Work component names (up to four levels of work unit information may be obtained)

f. Country

g. Duty location

h. Occupational classification or series

i. Locality pay areas

j. Pay plan

k. Grade level

l. Supervisory status

m. Supervisor name

n. Professional field

o. Selected competencies

p. Supervisor proficiency level responses

q. Employee proficiency level responses

r. Calculated differences in proficiency level responses

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

The information in the CEDAR tool is provided by the supervisors and employees who complete the CEDAR competency assessment.

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

No.

2.4. Discuss how accuracy of the data is ensured.

All information is provided by the supervisors and employees, who are presumed to be providing accurate information because their interest is in accurately and completely evaluating competency levels and identifying appropriate training to address any competency gaps. The system itself does not manipulate or interpret the information entered by the supervisors and employees, nor by other agency personnel or OPM. Any information entered into the system by a supervisor or employee is recorded as entered. After entering all proficiency level ratings and/or other information and clicking "Save and Continue," the user is provided a review page and provided with options for editing, saving for later, or submitting.

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

Privacy Risk: There is a risk that more information than is necessary to evaluate an individual's competency and identify training is collected and maintained.

Mitigation: This risk is mitigated in the tool, which has been designed to only request and record the information necessary to conduct an assessment and to permit an agency to conduct necessary analyses.

Privacy Risk: There is a risk that an employee user might disagree with the accuracy of the information that their supervisor enters or that a supervisor user might disagree with the accuracy of the information their employee enters.

Mitigation: This risk is mitigated by allowing and encouraging supervisors and employees to review the information they have entered into the system before being asked to submit it. All users will be provided with the opportunity to review all information they have entered prior to submission. The entered and confirmed information is considered the user's assessment, and disagreement about assessment numbers should be part of the conversation between the supervisor and employee.

Section 3.0. Uses of the Information

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

The information collected by CEDAR is initially used by the employee and the employee's supervisor. Once the competency assessment has been completed by both individuals, the proficiency level ratings and the calculated differences are automatically available to both the supervisor and

employee. The information can be downloaded/printed by the supervisor and printed by the employee. The purpose of having these functions available is for one-on-one discussions between the supervisor and employee about the results and potential training and development needs.

The information from CEDAR that is collected and maintained in the aggregate at the component levels, agency, and by OPM are used for comprehensive analyses to identify broader trends in strengths and gaps. The results can be used to home in on agency-wide and government-wide training and development needs that need to be addressed in order to close gaps.

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.

Analyses are currently expected to be performed outside of the context of CEDAR using data downloaded by authorized users. No identifiable information will be available for these analyses, and results will be reported in aggregate.

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

Within OPM, one-two SuperAdmins in Employee Services will have access to all of the information, including identifiable information, in the tool. Others, in OPM Human Resources and supervisors throughout OPM, will have access just as any other agency would, which is limited to identifiable information only for employees and supervisors about whom the information pertains or records with deidentified information at the component or agency level for analysis and reporting purposes. The CEDAR tool is intended for use

Government-wide and will have authorized users at each agency. These users will have access to various levels of the data but without names, emails addresses, or other identifiable information.

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

Privacy Risk: There is a risk that an unauthorized user may access the information.

Mitigation: This risk is mitigated by requiring users to register with a government email address and implementing role-based access controls so that users can access only information appropriate to their role in the system.

Privacy Risk: There is a risk that an authorized user may have access to more information than is necessary to fulfill their business function or that an authorized user may use the information in CEDAR for an unauthorized purpose.

Mitigation: This risk is mitigated by ensuring supervisors confirm during their initial registration process that they understand that assessment information is to be used solely for training and development purposes and not for performance, hiring, or compensation. Similar information about the uses of CEDAR results is also provided in training and communication materials. The risk is also mitigated by ensuring that role-based access controls are used to limit the information to which a particular user has access.

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 are presented with a Privacy Act statement when they register to use the CEDAR tool. That statement informs them as to the reason their information is being collected and how it will be used. In addition, prior to deploying the tool, OPM will be communicating with agency POCs and providing them with information about the tool to share with their agency personnel. This PIA and the SORN referenced in Section 1.2 also provide notice.

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

Any decisions regarding which individuals participate in using the CEDAR tool is determined at the agency level. Once individuals log into the system and begin the assessment process there is no opportunity to opt out of providing any of the required information.

4.3. Privacy Impact Analysis: Related to Notice

Privacy Risk: There is a risk that individuals will not be provided with notice about why their information is being collected and how it will be used.

Mitigation: This risk is mitigated by presenting users with a Privacy Act statement when they register and provide their information within the CEDAR tool and via publishing this PIA and the SORN referenced in Section 1.2.

Section 5.0. Data Retention by the Project

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

The information in the CEDAR tool is subject to a retention schedule that calls for deletion after three years unless a business need is identified that warrants longer retention. Currently the program plans to retain the records for three years but will revisit this decision as the tool develops and usage increases in order to determine whether longer retention is warranted. The information is retained so that agencies can track their progress in closing gaps and identifying changes in their workforce.

5.2. Privacy Impact Analysis: Related to Retention

Privacy Risk: There is a risk that the information will be retained from longer than is necessary to achieve the business need for its original collection.

Mitigation: This risk is mitigated by requiring adherence to the applicable records schedule and carefully considering the business needs of OPM and the participating agencies.

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.

Information is regularly shared outside of OPM with the agencies whose personnel use the tool to conduct competency assessments. The level of information shared is dependent on the user's role. Employees and supervisors who use the tool have access to individually identifiable

information for which they have a need to know such that employees see only their own information, but supervisors see the information about all of the individuals they supervise. Other agency personnel have access generally only to de-identified information consistent with their role within the agency. Record retrieval is done by means of an individual's secure login to the CEDAR web application.

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

The external sharing referenced in Section 6.1 is released pursuant to routine uses "h" and "i" in the applicable SORN, consistent with the purpose for which the information was collected: to determine competency levels to better understand employee proficiency strengths and gaps; to identify targeted training and development opportunities in order to upskill and reskill employees; to determine employees' competency strengths and areas for improvement, so that necessary training and development opportunities can be identified, and skills gaps can ultimately be closed. In addition, the system is intended to provide agencies with aggregated results of their assessments to support their competency gap analyses, which contribute important information for personnel training, and development efforts. The purpose of the CEDAR tool cannot be realized without providing information at appropriate levels to the external agency users.

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

The data retrieved from CEDAR is strictly for use by the agency retrieving it and to be used solely for (a) conversations between a supervisor and employee about training and development needs; or (b) analyses of aggregated data for component-wide, agency-wide, and/or Government-

wide understanding of the results. OPM will provide training instructions to agency personnel who are implementing the assessment tool for a subset of their employees with training and informational materials regarding the purpose of the tool and what they as users are allowed to do with the results that the tool generates.

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

Each agency is responsible for the data they access through CEDAR. Except in aggregated form, as the results of data analysis, or based on a request from a specific agency, OPM personnel should not be disclosing data outside of the agency.

6.5. Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk that information about the individuals who complete competency assessments in the tool will be used by participating agencies for a purpose that is inconsistent with the intended business purpose.

Mitigation: This risk is mitigated through training and providing users with information regarding the purpose of the tool and permissible uses of the results generated by the tool. In addition, supervisors certify at the time they register to use the tool that they understand the information is only to be used for training purposes.

Section 7.0. Redress

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

Supervisors and employees who complete an assessment using the competency tool will have access to the information they submitted via their own secure login to the application.

In addition, individuals seeking access to their records may submit a request in writing to the Office of Personnel Management, Freedom of Information Act Office, 1900 E Street N.W., Washington, DC 20415. Individuals must furnish the following information for their records to be located:

1. Full name.
2. Employing agency.
3. Government email address used.
4. Supervisor's name.
5. Signature.
6. The reason why the individual believes this system contains information about him/her.
7. The address to which the information should be sent.

Individuals requesting access must also comply with OPM's Privacy Act regulations regarding verification of identity and access to records (5 CFR 297).

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

Individuals may log into the CEDAR tool to make changes to their information or they may contact the OPM SuperAdmin if they encounter issues with using the CEDAR tool.

In addition, individuals may also request that records about them be amended by writing to the Office of Personnel Management, Freedom of Information Act Office, 1900 E Street N.W., Washington, DC 20415 and furnish the following information for their records to be located:

1. Full name.
2. Employing agency.
3. Government email address used.
4. Supervisor's name.
5. Signature.
6. Precise identification of the information requested to be amended.

Individuals requesting amendment must also follow OPM's Privacy Act regulations regarding verification of identity and amendment to records (5 CFR 297).

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

When individuals provide their information in the tool, they are instructed concerning how to access their information. More generally, individuals receive notice via publication of this PIA, and the SORN referenced in Section 1.2.

7.4. Privacy Impact Analysis: Related to Redress

Privacy Risk: There is a risk that individuals may not be provided with information about how to access and amend their records to ensure that they are accurate, and that appropriate skills gaps and training are identified.

Mitigation: This risk is mitigated by providing notice to individuals within the tool itself, through information provided to the participating agencies, and via publication of this PIA and the SORN referenced in Section 1.2.

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?

Only authorized users will have access to the CEDAR tool and the information it contains. The tool will be monitored and OPM will be in contact with the participating agencies to reinforce the purpose of the tool and appropriate use.

Specifically, OPM keeps a log of when users log in to the tool. While OPM does not track what pages or reports users look at, if users save or submit data, that information is recorded and available to specific users based on permissions settings. Supervisors can only see report data for their own employees. However, an agency Administrator can see report data for all users in their respective agency and Super Administrators can see report data for all users within the system.

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

OPM personnel are required to take OPM's annual IT Security and Privacy Awareness training. OPM does not impose a training requirement on other agency users, but annual security and privacy awareness training is required throughout the Federal government.

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

Agency POCs are responsible for updating all authorized user access for their agency with the OPM Super Administrator and must provide a reason for asking that access be granted with all requests. Agencies must also notify the OPM SuperAdmin if users who are authorized to access the data should have those permissions revoked for any reason. This will be communicated to all agencies during training and in the written form posted on the site.

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?

There are no formal information sharing agreements or MOUs related to the tool. Agencies who wish to use the tool are instructed to contact OPM. Access to the system is determined by OPM ES. Any future information sharing agreements or MOUs regarding sharing the information in the tool will be vetted with the appropriate OPM stakeholders, to include the Chief Privacy Officer and the Office of the General Counsel.

Responsible Officials

Veronica Villalobos

Principal Deputy Associate Director

Employees Services

Approval Signature

Signed Copy on file with the Chief Privacy Officer

Kellie Cosgrove Riley

Chief Privacy Officer