



Privacy Impact Assessment
for the

HRLinks System

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Abstract

The Human Resources Links system (HR Links) provides human resources, and time and attendance capabilities for the Office of Personnel Management (OPM). A commercial vendor provides the application and a contractor operates the two Federal Risk and Authorization Management Program (FedRAMP)-certified data centers where the application is hosted. This Privacy Impact Assessment covers OPM's use of HR Links since the application uses personally identifiable information (PII).

Overview

The Human Resource Links system (HR Links) is designed to meet the information and analytical needs of various government organizations. The system is operated by a vendor under a contract with the General Services Administration (GSA) in which OPM participates. OPM uses HR Links for its day-to-day operations related to human resource management and time and attendance.

Currently, there are three other government agencies hosted by the vendor's servers on this system: GSA, the National Credit Union Association, and the Railroad Retirement Board. While all four agencies have information that resides in HR Links, the information is logically separated and access is controlled so that each agency can access its own information but not that of the other agencies.

OPM uses HR Links for all of its human resource management functions. This includes tracking, producing, and storing personnel actions, and supplying human resources information to generate reports regarding various topics including organizational rosters, retention registers, retirement projections, length-of-service lists, and award lists. In addition, OPM can use information in HR Links to determine the impact of policies and practices on hiring and retaining minorities, women, veterans, and disabled persons, analyzing their status in the work force, and establishing workforce diversity goals and timetables. HR Links also provides all necessary human resources information to authorized OPM managers and administrators, including pay and organizational hierarchy information. The HR Links



reporting function is embedded directly into business process flows as an integral part of the user interface for approved OPM human resources staff. A particular users reports are limited in scope to data they are approved to access according to their defined business roles.

In addition to human resources management functions, OPM uses HR Links for recording OPM employees' time and attendance. HR Links contains employee work schedules, hours worked, and leave records. OPM employees will log into a web-based self-service portal to initiate and, where applicable, approve electronic timecards and leave requests. This information is then sent to the GSA's Payroll, Accounting, and Reporting (PAR) system, which is responsible for OPM's payroll. The information flow between HR Links' time and attendance function and PAR is bi-directional, as PAR provides completed payroll information back to HR Links.

In addition to PAR, HR Links has several interconnections with other systems. It transmits information to and/or receives information from these systems via secure file transfer protocol (SFTP), which provides the ability to push data to external sources through batch file transfer. These systems are USA Staffing, electronic Official Personnel Folder (eOPF), Employee Express, and the Enterprise Human Resources Integration (EHRI).

USA Staffing (USAS) contains information on OPM positions, job announcements and certificates, and applicant information. HR Links has a bidirectional on-demand connection to USAS to track which positions are open or being filled, and to transmit information about selected applicants from USAS into HR Links when an applicant becomes an OPM employee. When a request to fill a position is approved and finalized in HR Links, position information, such as position title, series, and pay plan, is sent to USAS from HR Links to start this process. After all the phases of the hiring process occur in USAS, and once a candidate has accepted a final offer in USAS, USAS sends a notification that a new hire is being requested to HR Links. The information that USAS transmits to HR Links includes demographic information, such as name, address, and birth date of the new employee, in order to complete the hiring process in HR Links.

HR Links transmits OPM employees' personnel records (e.g. hiring actions, promotions, reassignments, realignments, separations), including Social



Security number (SSN), to EHRI and eOPF, systems that are designed to improve the Federal Government's human capital management and to maintain an employee's official personnel records.

Employee Express (EEX) allows employees to make changes directly to a variety of personnel, benefits, and payroll information. This is a bi-directional connection. Information is ingested into EEX from HR Links and, after an individual makes permitted changes in EEX, the information, along with the employee's SSN for verification, is transmitted back to HR Links where it is used to update an employee's record. More specifically, HR Links sends EEX Thrift Savings Plan (TSP) and Federal Employee Health Benefits (FEHB) information every pay period. HR Links receives and processes daily EEX transaction files. In addition, on a recurring basis, HR Links sends information about TSP and FEHB transactions to PAR.

Section 1. 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?

In general, OPM collects information to conduct its human resource management functions pursuant to a variety of statutory provisions contained in Title 5 of the United State Code, including, for example, 5 U.S.C. §§ 1302, 2951, 3301, 3372, 4118, and Title III; various regulations codified in Title 5 of the Code of Federal Regulations; and Executive Orders, including EO 9830, EO 12107, and EO 9397, as amended by EO 13478 (regarding use of Social Security numbers).

Additional authorities are relevant to the collection of time and attendance information, including various provisions of 5 U.S.C. chapters 55, 61, and 63; 29 U.S.C. § 201; and 5 C.F.R. Parts 532, 550, 551, 610, and 630.

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

The applicable SORNs for the data in HR Links are OPM/GOVT 1 General Personnel Records and OPM/INTERNAL-5 Pay, Leave, and Travel records.



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

Yes, A System Security Plan (SSP) was developed using a GSA template accepted by OPM's CISO and authorizing official. Each HR Links agency's security requirements are documented individually within the SSP security controls narrative as applicable.

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

Various provisions in General Records Schedule 2.1, 2.2, 2.3, 2.4, and 2.5 apply to OPM's records in HR Links.

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 HR Links is not collected from or about members of the public and, therefore, the PRA does not apply.

Section 2. Characterization of the Information

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

HR Links collects, uses, and maintains personal information, position information, and time and attendance information about Federal employees.

Personal information includes name, Social Security number (SSN), date of birth and age, home address and telephone number, emergency contacts, race and national origin data, gender, handicap, veteran status, education history, and benefits information (e.g. type of insurance, plan, annuity information, and retirement plan).

Position information includes, but is not limited to, pay plan, occupational series, grade, step, basic and adjusted pay, locality pay, awards and other changes to pay, duty location, physical geographic location, career ladder



grade, position title, position description codes and job codes, supervisory status, detail or temporary promotion information, cybersecurity codes (i.e., type of cybersecurity duties), telework eligibility, hierarchy data (i.e., reporting to position, organization, and reporting to organization), position sensitivity, bargaining unit status (BUS) code, Fair Labor Standards Act (FLSA) status, hire and separation dates, and other dates such as those related to Wage-Grade Increases (WGIs) or promotions.

Time and attendance information includes information about work schedules, leave entitlement, and hours worked, paired with name, DOB, and SSN.

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

The information in HR Links comes from a variety of sources. The most direct source is via data entry within HR Links by OPM human resources staff who use HR Links for human resource management functions, such as entering personnel actions related to the employee's position description or location. For time and attendance purposes, OPM employees initiate and approve, where applicable, electronic time cards and leave requests.

In addition, HR Links receives information from other systems via secure file transfer protocol (SFTP). These systems include GSA's Payroll, Accounting and Reporting system (PAR), USA Staffing, and Employee Express (EEX). HR Links sends updated personnel data to PAR along with the time and attendance information required to perform payroll actions. PAR provides HR Links with the resulting payroll information after each payroll processing cycle. USA Staffing provides HR Links with information about job announcements and certificates, and information about applicants who are selected for a vacancy. EEX allows individual employees to make a variety of discretionary personnel, benefits, and payroll transactions (e.g., changes to Financial Allotments, Health Benefits, Thrift Savings Plan, Direct Deposit, Federal and State Taxes, and Home Address), which are then transferred to HR Links.



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

HR Links does not collect information from commercial sources or publicly available data.

2.4. Discuss how accuracy of the data is ensured.

During the transition to HR Links, an initial set of information was loaded into HR Links as a mirror of the current system serviced by GSA. This information included each employee's current information, including personal, position, and time and attendance information, as well as that same information from when they first became an OPM employee. The accuracy of that information was checked via functional specification testing by OPM staff from the Human Resources Office and the Office of the Chief Financial Officer in order to validate the data and make sure the information coming from other systems was transferring correctly. Once OPM is fully transferred to HR Links, OPM human resources employees review, update, and enter data directly into the system, checking for accuracy as they do so. Administrative Officers, supervisors, and managers can also enter a position-request within the system, which flows to HR employees to continue the recruitment process.

HR Links incorporates a workflow process customized for each type of personnel action. Based on the type of personnel action, the workflow dictates a review process for all appropriate stakeholders and subject matter experts before the action is completed, contributing to the accuracy of the information. These include human resource assistants, specialists, leads, and managers, as well as Administrative Officers, supervisors and managers, and those in budget and finance roles.

HR Links also includes front-end edits which only allow certain types of information to be entered into fields. For example, when a user enters an occupational series for a new hire, they are only presented with position titles that are relevant to that series. Likewise, when a user enters duty location information, searches for an area only populate available OPM duty



location results for that area. These front-end edits prevent inaccurate data from being entered.

Payroll reconciliation reports provided to OPM HR based on information submitted through HR Links may highlight inconsistencies and potential errors which can be addressed and corrected before they affect an employee.

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

Privacy Risk: There is a risk that the information in this system will be inaccurate or incomplete, resulting in an adverse decision or expense for the individual.

Mitigation: This risk is mitigated by only permitting authorized human resources staff with appropriate expertise to enter information into the system, incorporating reviews into the system workflows, through front-end edits built into the system, and through careful review of payroll reconciliation reports generated by the system.

This risk is also mitigated for time and attendance information because the individual employee enters his or her own information, which is then reviewed and approved by a supervisor. Additional corrective actions can be taken by OPM-assigned managers and administrators who can assist both business users and individual employees in correcting information, consistent with their authority and organizational affiliations.

Section 3. Uses of the Information

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

OPM's Office of the Chief Financial Officer uses information in HR Links for budgetary planning, reporting, and to ensure fiduciary standards are met. OPM's Human Resources Office collects and uses personal and position data to fulfill its human resources management mission, including ensuring employees receive correct benefits, are in their right positions, can make accurate changes to employee records, and are paid correctly. More



specifically, certain data elements in HR Links are used to identify the employee, such as name, SSN, date of birth; to communicate as necessary with the employee, such as mailing address, phone number, and email address; to support and validate employee benefits and compensation; and to document hours worked by employees on daily basis. Position information is used to capture records of an employee's duties, occupational series, and pay plan; ensure accurate reporting needs in the agency hierarchy; maintaining position descriptions; record proper pay grading; note supervisory status; record position changes such as temporary occupational reassignments or promotions; and track physical work locations in the event of an emergency. The information in the system may also be used in the event of an emergency, such as for locating employees during a disaster.

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 does not use technology to conduct electronic searches, queries or analysis to discover predictive patterns or anomalies. However, it does allow some reporting capabilities on discrete data entered into the system. This could include reports on personnel listings, organizational hierarchies, pay, telework eligibility, work schedules and leave usage, duty locations, and position data. Some of these reports may match a primary key, such as an employee identifier, between two associated databases within HR Links in order to pull information from both areas accurately.

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

All OPM employees have access to HR Links in in order to manage time and attendance, based on their respective business role. In addition, all employees have the ability within HR Links to modify their personal phone number, personal email, and emergency contacts without approval. They can also update their name, subject to an approval process. Managers may also have the ability to request, through HR Links, that a new position be



filled. This “recruit fill” request begins the recruitment process. Administrative Officers (AOs) may also be able to initiate these “recruit fill” actions, and may also institute other personnel actions on behalf of their respective OPM organization. AOs may also view, and potentially write, queries for reporting based on their organizational needs, limited to their respective OPM organization’s information. OCFO staff has access to HR Links to implement timekeeping roles, and to analyze time and attendance data to fulfill mission requirements. More generally, there are four tiers of OPM users in HR Links. Tier one users are employees who can access their own personal data only, to include personal contact information and time and attendance records. Examples of tier two users are an employee’s supervisor who has access to information including that employee’s home address, personal contact information, and time and attendance records but specifically excluding SSN and DOB. They have access to their employees’ records to view or modify aspects such as telework eligibility, performance appraisal results, and hierarchy information. Tier three users are certain OPM human resources staff, time and attendance administrators, and timekeepers who have a need to access employees’ information, including SSNs and DOBs, attendance records, and all of the information available at tiers one and two. Tier four users are another subset of OPM human resources staff who need access to voluntarily reported employee data, including race and national origin, to evaluate how OPM is meeting its policies and practices on hiring and retaining minorities, women, and disabled persons, and analyzing their status in the workforce. All tier four users have access to tier three information as well; however, they may not have access to all tier two functionality unless they hold a supervisory positions. Additional (limited) access is granted to the vendor’s resources working on the HR Links project.

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

Privacy Risk: There is a risk that an authorized person may access the information for an unauthorized purpose, resulting in an individual’s information being used in a manner not consistent with the original program’s purpose or user’s specific mission area and authority.



Mitigation: This risk is mitigated by the use of role-based access controls that limit a system user's access to only that information that is needed for an authorized business purpose. In addition, system audits are performed to determine whether is being accessed and retrieved appropriately. Audit logs are controlled by the vendor as part of the shared service provider responsibilities; OPM can gain access to the audit logs upon request. The risk is further mitigated by appropriate training of system users, who are also subject to applicable personnel security investigations and must be deemed suitable prior to system access rights being granted.

Privacy Risk: There is a risk that an unauthorized person may access the information in the system.

Mitigation: This risk is also mitigated by the use of role-based access controls that limit a system user's access to only that information that is needed for an authorized business purpose. In addition, system audits are performed to determine whether is being accessed and retrieved appropriately. Audit logs are controlled by the vendor as part of the shared service provider responsibilities; OPM can gain access to the audit logs upon request.

Section 4. 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 may not receive direct notice about the human resources management information and functionality in HR Links but they do receive notice at the original points of information collection, through Privacy Act notices and other instructions. Notice is also provide through the publication of this PIA and the relevant SORNs referenced in Section 1.2.



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

Individuals do not have the ability to consent to their information being included in the HR Links system once they have provided it to OPM. However, individuals may decline to provide certain data elements such as information concerning race, national origin, disability, and ethnicity.

4.3. Privacy Impact Analysis: Related to Notice

Privacy Risk: There is a risk that employees will not know that HR Links collects, uses, maintains, and disseminates information about them.

Mitigation: This risk is partially mitigated through information provided to employees when they receive login access and training on how to use the system. It may also be mitigated through the provision of Privacy Act statements at various points of information collection and through publication of this PIA and relevant SORNs.

Section 5. Data Retention by the project

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

The records in HR Links are retained in accordance with the records schedule referenced in Section 1.4.

5.2. Privacy Impact Analysis: Related to Retention

Privacy Risk: There is a risk that the records in the system will be retained for longer than is necessary to meet the business need for which they were collected.

Mitigation: This risk is mitigated by following the relevant records schedule.



Section 6. Information Sharing

6.1. Is information shared outside of OPM as part of the normal agency operations? If so, identify the organization(s) and how the information is accessed and how it is to be used.

OPM shares the information it collects, maintains, and uses in HR Links with GSA for proper payroll and payment distribution to employees, in addition to providing the information to other systems within OPM to ensure proper recording of OPM's personnel information. The information in HR Links is also shared as necessary with contractor personnel who administer the HR Links system and for other necessary and proper business purposes articulated in the respective SORNs referenced in Section 1.2.

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

The sharing described in Section 6.1 is compatible with the purposes set forth in the SORNs referenced in Section 1.2. For example, general personnel records are collected and maintained in accordance with the OPM/GOVT-1 SORN whose stated purposes is, in part, to provide a basic source of factual data about a person's Federal employment while in the service and after his or her separation. Pay and leave records are collected and maintained in accordance with OPM/INTERNAL 5 whose stated purpose is to administer the pay, leave, and travel requirements of OPM. The OPM/GOVT 1 SORN contains, among others, the routine uses t and jj that permit the referenced sharing.

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

Non-Disclosure Agreements (NDAs) are required for all tenants of HR Links and prohibit further dissemination of information.

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

All information accessed or retrieved from HR Links is audited by the system. The audit logs include who accessed or retrieved the information, when the



information was accessed or retrieved and what the information included. OPM can gain access to the audit logs upon request.

6.5. Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk that the information in HR Links will be shared with a third party and used or disseminated for a purpose that is not consistent with the purpose for which it was collected.

Mitigation: This risk is mitigated by the system's use of NDAs, which limit re-dissemination of information and by the terms of the vendor contract, which requires that the vendor protect the information in the system. It is also mitigated through the audit logs from system audits that OPM may request as necessary in order to determine whether information is being accessed by authorized users for an authorized purpose.

Section 7. Redress

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

All OPM employees will have access to HR Links via their Personal Identity Verification (PIV), according to their role. Directly in HR Links, employees can access and manage their time and attendance records. In addition, OPM employees have the ability within HR Links to modify their personal phone number, personal email, and emergency contacts without approval. They can also update their name, subject to an approval process.

Additional updates to certain benefits and TSP information can be made through Employee Express, which then transmits the updated information to HR Links.

Additionally, individuals who wish to access records in this system may follow the procedures outlined in the applicable SORN referenced in Section 1.2 and comply with the OPM's Privacy Act regulations at 5 CFR part 297.



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

Individuals can manage their time and attendance records directly in HR Links. Directly in HR Links, employees can access and manage their time and attendance records. In addition, OPM employees have the ability within HR Links to modify their personal phone number, personal email, and emergency contacts without approval. They can also make changes to certain benefits and TSP information in Employee Express, which then transmits those changes to HR Links. Additionally, assigned managers, Administrative Officers, and HR administrators will be able to update their employees' data, such as education, benefits, and telework information (eligibility and agreements). In the event that OPM employees need to change something else in their record, they can contact OPM Human Resources at OPMHumanResources@opm.gov.

Additionally, individuals who want to request that information in this system be corrected may follow the procedures outlined in the applicable SORN referenced in Section 1.2 and comply with OPM's Privacy Act regulations at 5 CFR part 297.

7.3. How does the project notify individuals about the

OPM is responsible for training employees on how to use the HR Links system, such as for inputting their time and attendance. Additional training for HR employees is also provided by the contractor.

Individuals are also notified on the procedures for correcting their information, through the applicable SORN listing in 1.2, and through this PIA.

7.4. Privacy Impact Analysis: Related to Redress

Privacy Risk: There is a risk that individual users will not know how to access and, if necessary, seek amendment of their information in HR Links.

Mitigation: This risk is mitigated by providing users with information about how to access and amend their records during training specific to HR Links



and via EEX. In addition, individuals receive notice via the relevant SORNs referenced in Section 1.2 and through this PIA.

Section 8. Auditing and Accountability

8.1. How does the project ensure that the information is used in accordance with stated practices in this PIA?

HR Links employs a variety of security measures designed to ensure that information is not inappropriately disclosed or released. In addition, system audits are performed to determine whether information is being accessed and retrieved appropriately. Audit logs are controlled by the vendor as part of the shared service provider responsibilities; OPM can gain access to the audit logs upon request. System users also are subject to training during which they are appraised of appropriate use of the system and the information it contains.

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

OPM employees are required to take annual Security and Privacy awareness training. In addition, OPM's human resources office will provide system-specific training on an as-needed basis, and use a train-the-trainer process to continue transition of information. This training includes proper system utilization, access procedures, and process workflow for reviewing information for accuracy.

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

OPM follows its internal onboarding and access control procedure for access to HR Links. Access control is managed through a third-party vendor's application that regulates roles and permissions, integrating with the agency's Active Directory capabilities.

End user application roles are assigned and enforced by OPM according to an individual's role and responsibility within the agency.



There are four tiers of OPM users in HR Links. Tier one users are employees who can access only their own time and attendance records. Examples of tier two users are an employee's supervisor who has access to information including that employee's home address, personal contact information, and time and attendance records but specifically excluding SSN and DOB. They have access to their employees' records to view or modify aspects such as telework eligibility, performance appraisal results, and hierarchy information. Tier three users are certain OPM human resources staff, time and attendance administrators, and timekeepers who have a need to access employees' information, including SSNs and DOBs, attendance records, and all of the information available at tiers one and two. Tier four users are another subset of OPM human resources staff who need access to voluntarily reported employee data, including race and national origin, to evaluate how OPM is meeting its policies and practices on hiring and retaining minorities, women, and disabled persons, and analyzing their status in the workforce. All tier four users have access to tier three information as well; however, they may not have access to all tier two functionality unless they hold a supervisory positions.

Additional (limited) access is granted to the vendor's resources working on the HR Links project. They undergo an OPM background check and must go through the onboarding process.



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 OPM HR Line of Business (HR LOB) team maintains approved interconnection system agreements (ISAs) for all organizations and systems that interface with OPM's instance of HR Links.

HR LOB staff reviews all Memoranda of Understanding and ISAs every three years. Any new system or external access to the HR Links system or new information usage requirements will be evaluated by the appropriate HR LOB personnel in consultation with relevant OPM stakeholders, including the Chief Information Security Officer and the Chief Privacy Officer.

Responsible Officials

Andrea Bright, Chief Human Capital Officer
OPM Human Resources

Rochelle Bayard, Associate CFO
Financial Operations Management
Office of the Chief Financial Officer

Reviewing Official Signature

Signed Copy on File with the Chief Privacy Officer

Kellie Cosgrove Riley
Chief Privacy Officer