



## **Privacy Impact Assessment**

### **Qualtrics**

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### **Contact**

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## **Abstract**

The U.S. Merit Systems Protection Board (MSPB) has purchased licenses for Qualtrics, LLC's Qualtrics XM Platform (Qualtrics). Qualtrics is a Federal Risk and Authorization Management Program (FedRAMP) certified, cloud-based Software as a Service (SaaS) experience management company owned by SAP SE that provides quantitative statistical analysis capabilities. MSPB uses Qualtrics to develop and administer surveys as part of MSPB's general authorities to conduct studies and research on matters relevant to the Merit System Principles (MSPs) and Prohibited Personnel Practices (PPP). MSPB is conducting this Privacy Impact Assessment (PIA) because Qualtrics collects and processes personally identifiable information (PII) and other sensitive information when providing the quantitative statistical analysis services contracted by MSPB, and MSPB collects PII and other sensitive data in order to facilitate the use of these surveys.

## **Overview**

The purpose of the Qualtrics SaaS environment is to provide MSPB with a cloud platform to develop and administer surveys to (1) prospective, current, or former Federal employees, or (2) MSPB employees, customers, and stakeholders. These surveys support (1) special studies of the Federal civil service under 5 U.S.C. § 1204(a)(3), (2) review of OPM regulations and significant actions under 5 U.S.C. § 1204(e)(3) and § 1206, and (3) evaluation of agency operations, programs, and performance under the Government Performance and Results Modernization Act and related requirements. The use of Qualtrics supports MSPB's mission to "conduct, from time to time, special studies relating to the civil service and to other merit systems in the executive branch" by providing a platform to generate and manage web-based surveys.

The Merit Principles Survey (MPS) and other surveys conducted by MSPB's Office of Policy and Evaluation (OPE) are tools that measure Federal employees' perceptions of whether, and to what extent, MSPs are being protected and PPPs are being prevented in Federal agencies. MSPB surveys ask participants to share their attitudes, behaviors, and thoughts on topic areas related to the MSPs, PPPs, and other personnel management topics relevant to the merit systems. Demographic questions are also included to evaluate differences among subgroups in the way responses were distributed.

Examples of surveys to be conducted using Qualtrics include:

- Large-scale, Government-wide surveys of civilian Federal employees, such as MSPB's periodic MPS;
- Smaller-scale study surveys administered to employees of specific Federal agencies or individuals who engage in a specific activity (e.g., applying for a Federal job);
- Internal surveys of MSPB employees; and
- Surveys of MSPB customers (e.g., individuals and agency representatives who participate in an appeal).

Information that may be collected and stored on Qualtrics falls into three broad categories:

- Sampling information—information used to identify and select employees for a survey. Examples of such information include employment status (e.g., permanent full-time), employing agency, and supervisory status.
- Administrative information—information used to distribute and administer the survey. Examples of such information include email address, name, and demographic information (such as occupation or agency). (Demographic information is usually self-reported by the agency, but if available in the sampling information it could be presented to the employee in the survey for confirmation or correction.)
- Response information—information comprising the survey respondent’s answers to the questions (e.g., work attitudes and work experiences) and survey activity (e.g., metadata such as last item completed, date survey was accessed).

In order to administer an MSPB survey, information about Federal employees is routinely collected from the Office of Personnel Management’s (OPM) Enterprise Human Resource Integration (EHRI) system. The data from EHRI is used to (1) identify current Federal employees, (2) determine survey eligibility, (3) collect contact information where necessary and available, (4) perform statistical weighting procedures using select demographic information, and (5) support research and reporting functions. All survey administrations, data cleaning, and statistical weighting procedures are executed by MSPB. At the end of the survey cycle, selected summary results and a technical report may be published, and a public version of the data file is released.

Records may be retrieved by survey case identifier or other personal identifier but are generally only retrieved in this manner leading up to and during the administration of special studies surveys. After the survey is administered, personal identifiers are rarely used to retrieve records or for any other purpose. Instead, post-administration of the survey, records are typically retrieved by a respondent characteristic (such as agency or demographic group) or response pattern (such as response to a particular survey item or set of items) in a manner that is not intended to identify individual survey respondents. Additionally, post-administration of the survey, records may be retrieved by personal identifier for a use consistent with the collection of the information and as agreed upon in a Memorandum of Understanding (MOU) between OPM and MSPB.

OPE will utilize and adhere to internal agency processes and policies to prevent unauthorized use and sharing of information. Only individuals with a “need to know” will be granted access to survey responses in Qualtrics, and these individuals will only be able to access specified information based on their roles and allocated system permissions. The System Administrator from MSPB will be the only authorized user able to create and remove Qualtrics users, and the Program Manager is responsible for identifying who will have access to their business unit’s surveys and responses. Authorized users will access Qualtrics through the agency’s single sign-on (SSO) service, which will automatically authenticate the user before granting them access. MSPB also plans to set up a regularly scheduled auditing and monitoring program, based on recommendations and guidelines from MSPB’s Privacy Officer.

Records in the system are protected from unauthorized access and misuse through various administrative, technical, and physical security measures, such as access controls, mandatory security and privacy training, encryption, multi-factor authentication, security guards, and locked offices.

## **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?**

MSPB's use of Qualtrics is consistent with all applicable laws, regulations, and policies, including: 5 U.S.C. §§ 1204(a)(3), 1204(e)(3), and 1206.

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

A System of Records Notice (SORN) is not required for Qualtrics; however, a SORN is required for MSPB's collection of information and use of Qualtrics. In accordance with the Privacy Act of 1974, MSPB proposes to establish a new MSPB system of records titled "Surveys for Special Studies of the Civil Service." This system of records contains information that MSPB collects, maintains, and uses in order to develop and administer the MPS and other special studies surveys, and to evaluate and distribute the results of such surveys. This system of records will be included in MSPB's inventory of record systems.

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

An Authorization to Operate (ATO) was granted for Qualtrics by FedRAMP on June 29, 2018. Assessment and Authorization was completed by Qualtrics as part of the FedRAMP authorization package. At the agency level, MSPB has completed a System Security Plan and System Privacy Plan for Qualtrics as part of the agency's internal ATO process.

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

Data retention is covered in MSPB's contract with Qualtrics. In addition, MSPB is currently working to develop a records schedule to submit to NARA for approval. Until a records schedule is in place, the records will be retained as permanent records.

Records retained by OPM in the EHRI may be retained indefinitely as a basis for longitudinal studies. After the disposition date in General Records Schedule-1 (GRS-1) or GRS 20, Electronic Records, such records should not be used in making decisions concerning employees. Data provided to MSPB from OPM's EHRI data warehouse under an OPM-MSPB MOU is retained until no longer needed or when OPM instructs MSPB to destroy data.

**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 PRA does not apply to OPE's survey activities. OPE is currently only collecting information from Federal employees in their official capacities.<sup>1</sup> In the event that OPE decides to collect information from members of the public, MSPB will initiate an Information Collection Request to OMB before the collection takes place.

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

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

Survey respondents constitute the categories of individuals for whom information is collected. This may include Federal employees, other non-MSPB Federal employees, and members of the public.

MSPB may collect the following categories of information from individuals.

1. Pay (e.g., Grade, Pay Plan).
2. Work Location (e.g., Agency, Personnel Office Identifier).
3. The Position (e.g., Occupational Series, Supervisory Status).
4. Performance (e.g., Rating Level, Rating Pattern).
5. EHRI Demographics (e.g., Sex, Veteran's Status).
6. Personal Identifiers, whether provided by the individual or as part of the administration of the survey (e.g., Employee Name and Email Address, randomly assigned identifier for survey administration).
7. Voluntary Survey Question Responses (e.g., Responses to Survey Questions).
8. Personnel Actions History (e.g., Service Computation Date for Retirement Purposes, Hiring Authority).

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<sup>1</sup> "Agency collections from 'agencies, instrumentalities, or employees of the United States' in their official capacities are generally not subject to the PRA." 44 U.S.C. § 3502(3)(A).

At the end of the survey cycle, selected summary results and a technical report may be published, and a public version of the data file is released. The purpose of this information is to provide objective, non-partisan studies that assess and evaluate Federal merit systems policies, operations, and practices.

In order to administer an MSPB survey, information about Federal employees is routinely collected from OPM's EHRI system. The data from EHRI is used to (1) identify current Federal employees, (2) determine survey eligibility, (3) collect contact information where necessary and available, (4) perform statistical weighting procedures using select demographic information, and (5) support research and reporting functions. All survey administrations, data cleaning, and statistical weighting procedures are executed by MSPB.

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

Individual survey participant records are obtained from OPM's EHRI system, which contains general personnel records from the OPM/GOVT-1 General Personnel Records system of records, from the individual Federal agencies that participate in MSPB's surveys, and from the individuals who voluntarily complete these 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.**

No. MSPB does not use information from commercial sources or publicly available data.

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

Qualtrics does not check for accuracy. It provides the services, and customers use the services as they wish. Qualtrics does not know what data is being collected. The survey creator solely determines what data is collected. Opinions and experiences are collected directly from participants of the surveys; therefore, responses are dependent upon the accuracy of the information provided by each participant. MSPB also collects contact information from OPM's EHRI system, which is presumed to be accurate.

## **2.5 Privacy Impact Analysis: Related to Characterization of the Information**

**Privacy Risk:** There is a risk that Qualtrics or MSPB will collect more information than necessary for its reports and analyses.

**Mitigation:** The risk is partially mitigated. Qualtrics is an enterprise survey software tool, and any risks that may arise likely involve the underlying collection of data rather than the software that is used to collect the data.

The purpose of MSPB special studies surveys is to collect the opinions and experiences of participants. Although personal contact information is collected, this information is only entered into the Qualtrics tool for the purposes of administering the survey. MSPB does not share personal contact information outside of Qualtrics unless required by a routine use in the SORN.

**Privacy Risk:** There is a privacy risk that Qualtrics or MSPB will fail to protect the anonymity of participants.

**Mitigation:** The risk is partially mitigated. Qualtrics treats all data as highly confidential and does not classify or represent the data because only the customer (i.e., MSPB) knows what data it is collecting. In other words, Qualtrics provides the services, and customers use the services as they wish. All data is safeguarded using industry best security practices that prevent unlawful disclosure.

OPE utilizes and adheres to internal MSPB processes to prevent unauthorized use and sharing of information. Only individuals with a need to know will be granted access to data associated with Qualtrics surveys, and these individuals will only be able to access specified information based on their roles and allocated system permissions. This data includes both the survey responses themselves as well as any additional data that may be collected from or about the survey participant. The MSPB Program Manager is responsible for identifying who has access to the surveys and responses. Authorized users will access Qualtrics through MSPB's SSO service that will automatically authenticate the user before granting them access.

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

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

The MPS and other special studies surveys are tools that measure Federal employees' perceptions of whether, and to what extent, MSPs are being protected and PPPs are being prevented in Federal agencies. MSPB surveys ask participants to share their attitudes, behaviors, and thoughts on topic areas related to the MSPs, PPPs, and other topics of personnel management relevant to the merit systems. Demographic questions are included to evaluate differences among subgroups and the way in which responses are distributed.

Internally, survey results will be shared with OPE, which develops and administers the surveys. Results may also be shared with other MSPB personnel on a need-to-know basis, including MSPB management, the Office of the General Counsel (OGC) for legal review, the Office of Information Resources Management for information technology (IT) support, and the Office of the Clerk of the Board for matters pertaining to information governance.

Externally, a de-identified summary of the results of the MPS will be shared with the President of the United States, Congress, and other Federal decision-makers to be used in developing policy that supports both merit and mission accomplishment. Aggregated survey results will also be shared with the public, primarily as reports, research briefs, and newsletters on the MSPB website. PII is not released outside the agency unless required by a routine use in the SORN.

All demographic information released to the public is presented in aggregate form to eliminate the potential of re-identifying any individual participant. Additionally, a copy of the de-identified aggregated data is provided to NARA as a permanent Federal record.

**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 MSPB plans to use such results.**

Yes. MSPB's use of Qualtrics will leverage Qualtrics' ability to conduct electronic searches, queries, and analyses to locate predictive patterns or anomalies. In particular, Qualtrics' quantitative statistical analysis capabilities will be used to evaluate differences among demographic subgroups when measuring their attitudes, behaviors, and thoughts on topic areas related to the Civil Service. The ability to quickly synthesize data is particularly valuable for interpreting large datasets.

**3.3 Are there other components with assigned roles and responsibilities within the system?**

Not applicable.

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

**Privacy Risk:** There is a risk that PII collected by Qualtrics or MSPB will be used inappropriately prior to it being aggregated into anonymous management reports or analyses.

**Mitigation:** This risk is partially mitigated. All data is owned and operated by MSPB and not Qualtrics. Qualtrics is the data processor. It is a self-service product whereby the Federal customer (i.e., MSPB) solely determines what data to collect, from whom, from where, for what purpose, and when to delete it.

Any data collected by MSPB is stored on a Federal Information Processing Standards 140-2 encrypted IT system to prevent unauthorized access. Access to participant contact information or raw survey data is limited to authorized MSPB employees who have a justifiable business need and who have undergone privacy training.

**Privacy Risk:** There is a risk that Qualtrics or MSPB could use the information collected for purposes other than that for which the information was collected, including for operational uses.

**Mitigation:** This risk is partially mitigated. Qualtrics will only process data to the extent necessary to provide services and does not disclose any data to third parties.

MSPB only collects PII that is directly related to administering a special study. All MSPB employees are required to take annual privacy training and are subject to discipline for inappropriately using PII.

## 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.

A Privacy Act Statement is made available to survey participants, informing them of the intended purpose and use of their information, and whether or how they may opt out of providing information. The following Privacy Act Statement is located in the MPS:

#### **Privacy Act Statement**

**AUTHORITY:** Collection of the information is authorized by 5 U.S.C. §§ 1204 and 1206, which requires the Merit Systems Protection Board (MSPB) to conduct special studies relating to the civil service and to other merit systems in the executive branch.

**PRINCIPAL PURPOSE(S):** The purpose of collecting this information is to study how well the Federal Government is managing its work force in adherence to the merit system principles. Only MSPB staff and our survey support contractor staff will have access to individually completed surveys. A de-identified summary of the results will be shared with the President of the United States, Congress, and other Federal decision-makers to be used in developing policy that supports both merit and mission accomplishment. Any reports issued following survey administration will contain only aggregated data and cannot be used to identify individual participants.

**ROUTINE USE(S):** No data will be disclosed that could be used to identify individual participants, except as generally permitted under 5 U.S.C. § 552a(b) of the Privacy Act of 1974. This includes sharing the information as necessary and authorized by routine uses in MSPB's System of Records Notice, MSPB – 2, Surveys for Special Studies of the Civil Service.

**DISCLOSURE:** Your responses to this survey are completely voluntary. There is no penalty if you choose not to participate. However, we encourage your participation to ensure that our data is complete and representative of the Federal workforce.

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

Individual participation in MSPB surveys is completely voluntary. There is no penalty if an individual chooses not to participate. Each potential survey participant is provided with the Privacy Act Statement informing them that participation is voluntary and that there are no penalties for refusing to participate.

## 4.3 Privacy Impact Analysis: Related to Notice

**Privacy Risk:** There is a risk that Federal employees participating in special studies surveys may not be properly protected because this collection of information does not meet the threshold for the PRA to apply, and therefore, certain protections of the PRA are not extended to this information collection.

**Mitigation:** This risk is partially mitigated. The Privacy Act requires that an agency supply notice to Federal employees any time PII is collected that could later be retrieved. MSPB requires that potential participants have expressed “informed consent” for any information collection regarding their survey participation. Survey activities must be vetted by the MSPB Privacy Officer to ensure that there is proper notice given to employees regarding the purpose, authority, and voluntariness of the information collection.

**Privacy Risk:** There is a risk that survey participants may not realize that the information they initially provide to MSPB may later be used for other purposes.

**Mitigation:** This risk is partially mitigated by publishing this PIA and the SORN for MSPB – 2, Surveys for Special Studies of the Civil Service, which states that, post-administration of the survey, records may be retrieved by personal identifier for another research purpose that complies with the MOU between MSPB and OPM. MSPB gives all potential participants the opportunity to decline or to discontinue participation at any point, minimizing any potential harm resulting from an individual’s lack of notice.

## Section 5.0 Data Retention by the Project

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

Generally, sampling and administrative information are retained only until the survey closes. PII such as employee name and social security number are used only to locate employees and administer the survey, and MSPB’s protocol is to purge such data from MSPB systems (including the Qualtrics environment) once the need for this information has been met. Response data may be retained for a longer period to use the data cleaning and analysis tools available in the Qualtrics environment.

## 5.2 Privacy Impact Analysis: Related to Retention

**Privacy Risk:** There is a risk that PII collected may be retained for a longer period than necessary.

**Mitigation:** MSPB mitigates this risk by deleting the data when no longer necessary. PII is removed from published datasets, and any demographic data received from participants is aggregated and not linked to any particular participant. Information used to initially contact prospective participants is typically taken from the OPM EHRI system and is deleted after completion of the survey administration or any subsequent follow-up.

## Section 6.0 Information Sharing

### 6.1 Is information shared outside of MSPB 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.

No. PII is not shared outside of MSPB as part of normal agency operations. PII is only shared with external parties when required by a routine use in the SORN for MSPB – 2, Surveys for Special Studies of the Civil Service. MSPB may share reports or other materials containing de-identified, aggregated survey results with the President of the United States, Congress, or the public. The purpose of this sharing is to provide objective, non-partisan studies that assess and evaluate Federal merit systems policies, operations, and practices.

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

The external sharing noted in 6.1 denotes that information may be shared in a manner consistent with the SORN for MSPB – 2, Surveys for Special Studies of the Civil Service. External parties provided PII under a routine use are subject to the same Privacy Act limitations on disclosures as MSPB employees. Any reports issued following survey administration will contain only aggregated data and cannot be used to identify individual participants, so SORN compatibility is not needed for such disclosures.

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

Yes. MSPB places limitations on re-dissemination of PII. With regard to the sharing of information with Qualtrics, MSPB's contract with Qualtrics provides for protections and limitations on Qualtrics' use of this information. Additionally, the information shared pursuant to the routine uses in MSPB's SORN is subject to limitations on further dissemination. MSPB outlines these limitations and obligations of the receiving agency through a transmittal letter. Generally, receiving agencies may not use the information for a reason not already approved by MSPB or further disseminate the information without prior written consent of MSPB.

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

MSPB utilizes FOIAonline (<https://foiaonline.gov/foiaonline/action/public/home>) to track requests for information disclosure pursuant to the Freedom of Information Act (FOIA), the Privacy Act, the routine uses in MSPB's SORNs, and statutes and regulations. FOIAonline is a web-based application that assists MSPB in tracking and recording requests received for the disclosure of information. This includes requests subject to the accounting provisions of the Privacy Act. The information retained as part of this accounting requirement includes the agency or individual requesting the information, a description of the requested information, the reason for the request, the date of the request, the date of the release, the authority for the release, and the limitations and obligations on the requesting agency or individual with regard to use and further dissemination.

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

**Privacy Risk:** There is a risk that the information is shared outside the scope of MSPB's SORN or without the proper authority or accounting.

**Mitigation:** This privacy risk is mitigated because MSPB only shares information outside the agency as documented in this PIA and as permitted by the SORN for MSPB – 2, Surveys for Special Studies of the Civil Service. An accounting of disclosures is documented each time the information is shared outside the agency pursuant to the SORN in MSPB's FOIAonline system. Additionally, annual agency privacy training educates MSPB employees on the appropriate way to protect PII and information maintained in an agency system of records.

**Privacy Risk:** There are risks associated with the fact that MSPB may not be able to control Qualtrics' retention of PII and survey responses.

**Mitigation:** This risk is partially mitigated. In MSPB's contract with Qualtrics, it is specified that MSPB is the owner of all data collected. Qualtrics is required contractually to destroy all information associated with any information collection at the end of the contract. MSPB also contracts for the right to investigate and audit a vendor's systems to ensure they are complying with MSPB policies, procedures, and retention schedules. Any egregious or potentially illegal conduct could be referred to OGC or investigated by the MSPB Privacy Officer. The Privacy Officer consults with MSPB's Office of Financial and Administrative Management to review agency contracts and ensure that appropriate language, including Federal Acquisition Regulations Privacy Act clauses, is included to protect participant PII.

## Section 7.0 Redress

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

Individuals seeking notification of and access to their records in this system of records may submit a request in writing to the Office of the Clerk of the Board, Merit Systems Protection Board, 1615 M Street, NW, Washington, DC 20419. Individuals requesting access must comply with MSPB's Privacy Act regulations regarding verification of identity and access to records (5 C.F.R. Part 1205).

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

Individuals may request that records about them be amended by writing to the Office of the Clerk of the Board, Merit Systems Protection Board, 1615 M Street, NW, Washington, DC 20419. Individuals requesting amendment must follow MSPB's Privacy Act regulations regarding verification of identity and amendment to records (5 C.F.R. Part 1205).

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

This PIA provides notice to individuals on how to correct information. Additionally, the SORN for MSPB – 2, Surveys for Special Studies of the Civil Service, provides information to individuals regarding how to correct their information.

### 7.4 Privacy Impact Analysis: Related to Redress

**Privacy Risk**: There is a risk that individuals will not be able to correct incorrect information that has been collected about them.

**Mitigation**: The risk is partially mitigated. The purpose of MSPB's special studies surveys is to produce statistical analyses and reports irrespective of the identities of survey respondents. MSPB collects a sufficient amount of responses during survey administration to ensure that one participant's erroneous information will not adversely affect the statistics and analyses generated from its research, or have any adverse or operational impacts on the participant. Because survey responses are collected directly from participants, responses are dependent upon the accuracy of the information provided by each participant.

**Privacy Risk**: There is a risk that individuals will be unaware of the procedure for requesting access to the information that has been collected about them.

**Mitigation**: This privacy risk is mitigated in several ways. This PIA provides information for individuals to understand how to seek redress, correction, or amendment. Additionally, MSPB's regulations and SORN providing the redress procedures are posted online.

## Section 8.0 Auditing and Accountability

The following questions are intended to describe technical and policy based safeguards and security measures.

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

MSPB ensures that the practices stated in this PIA are followed by implementing training, standard operating procedures, policies, rules of behavior, and role-based access. Only employees and contractors with a valid need to know may collect and use information obtained from surveys using Qualtrics. Moreover, any MSPB office or program that chooses to collect PII, regardless of whether the activity requires PRA submission, is required to conduct a Privacy Threshold Analysis (PTA) or a PIA. MSPB's Privacy Officer tracks and accounts for all survey research efforts by MSPB offices or programs through the PTA and PIA process. Additionally, MSPB has entered into an MOU with OPM that provides parameters for MSPB's use of the EHRI data from OPM.

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

All MSPB employees and contractors are required to complete privacy training when they on-board or begin working on an MSPB contract, respectively, and annually thereafter. MSPB's Privacy Officer logs all information management training completed by agency personnel. This ensures that personnel are knowledgeable of their privacy, FOIA, and records management responsibilities, which includes their obligation to protect PII.

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

MSPB employees who have a need to know to perform their official duties will have access to the surveys in Qualtrics. This includes MSPB employees who are involved in the development and administering of the surveys.

MSPB deploys role-based access controls and enforces a separation of duties throughout all MSPB operations to limit access to only those persons who have a need to know in order to perform their duties. This need to know is determined by the respective responsibilities of the employee.

**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 MSPB and outside?**

Data provided to MSPB from OPM's EHRI data warehouse under an MOU is retained until no longer needed or when OPM instructs MSPB to destroy data.

**Responsible Officials**

D. Fon Muttamara  
Chief Privacy Officer  
Merit Systems Protection Board

**Approval Signature**

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William Spencer  
Acting Executive Director  
Senior Agency Official for Privacy  
Merit Systems Protection Board