UNITED STATES OFFICE OF PERSONNEL MANAGEMENT

Open Government Plan Version 4.0

OPM.GOV

SEPTEMBER 2016

From the Director

I am pleased to share with you OPM's fourth Open Government Plan.

At OPM, we are dedicated to our mission of recruiting, retaining and honoring a world-class 21st Century workforce to serve the American people. We strive to be open and accountable in carrying out this mission, by finding new and more efficient ways to provide high-quality customer service to our many stakeholders.

Here are just a few examples of the programs through which we serve this variety of stakeholders:

- **Federal job seekers:** USAJOBS©, the federal government's online job portal, and Feds Hire Vets, a website devoted to federal employment resources for veterans, transitioning military service members, their families, and federal hiring officials.
- **Current federal employees:** the design, application, and analysis of the Federal Employee Viewpoint Survey (FEVS) and provision of a variety of kinds of insurance benefits.
- **Retirees and their families:** defined benefit plans (annuities), availability of a Thrift Savings Plan, and continued insurance benefits.

All of our programs benefit from an atmosphere in which transparency, collaboration, and participation are valued. For example, the USAJOBS© team has extensively collaborated with the site's users and with experts in several fields to improve how people experience the site. While safeguarding the privacy of their many users, that team has also sought out ways to increase transparency, including releasing structured information about Job Opportunity Announcements (JOAs).

In the following pages, you will learn about an assortment of activities that together make up our open government efforts, including public notice activities, partnerships with universities and other organizations, proactive disclosure of documents we expect the public to show a particular interest in, and participation in government-wide transparency initiatives such as the IT Dashboard.

You will also learn about our latest flagship initiative, which aims to make it easier for OPM offices to achieve transparency, accountability, and efficiency through institutionalization of records and information management. We are integrating our programs in the areas of open government, records management, privacy, Paperwork Reduction Act (PRA) and forms management, and electronic and information technology (EIT) accessibility (compliance with Section 508 of the Rehabilitation Act). The result will be a cadre of highly knowledgeable and capable information professionals who understand OPM's information management needs and responsibilities holistically and who can address information management problems systematically.

Thank you for taking the time to read our plan. All of us at OPM look forward to serving you further.

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Executive Summary

This Plan provides information on what OPM is doing to be more open in a wide range of areas – everything from optimizing websites to best meet the needs of users, to proactively disclosing frequently sought-after information, to posting data on government-wide platforms such as the IT Dashboard and regulations.gov.

The Plan also outlines our latest open government flagship (or major) initiative: to institutionalize records and information management (IM). Information management is the foundation for an open government. We will modernize our IM policies, processes, teams, and decisions to enhance transparency and accountability in particular.

We are:

- Combining a number of interrelated programs, including open government, privacy, and forms management, into a single organization
- Forming a dedicated team with the knowledge and skills to conduct the full range of information management functions. These individuals will be able to leverage their knowledge of one area to benefit their work in the other areas, thereby introducing efficiencies and reducing confusion
- Developing networks of subject matter experts (SMEs) throughout OPM who will be chosen by their leadership to represent their respective organizations in all of the areas for which our Information Management Group is responsible
- Revising our information management policies, records schedules, major guidance, privacy and Paperwork Reduction Act (PRA) documentation, and similar documentation. We will revisit these documents regularly – in many cases, annually

Through extensive cross-training of members of the Information Management team, we will avoid (1) constructing silos within information management at OPM and (2) having only a single employee with deep knowledge of any given subject – and we will more efficiently and responsively help OPM offices manage their information. The result, taken as a whole, will be an agency that properly manages its records, complies with a wide range of information management requirements, and can more easily be transparent while safeguarding the privacy of individuals.

Introduction

The Open Government Directive (M-10-06) of December 8, 2009 sets a standard for a more transparent, participatory, and collaborative government – that is, a more open government. When we are open, we increase our own accountability and build trust with the American people by sharing information, hearing about and implementing ideas, and engaging in ongoing conversations with employees and the public. The free exchange of ideas helps us learn, innovate, and grow more effective and efficient. Of course, we must also protect material that it is inappropriate or contrary to law to share, so we place a heavy emphasis on privacy, confidentiality, and security as well.

This Plan describes what we have recently done to enhance transparency, participation, and collaboration at OPM and what we plan to do in that regard over the next two years. New and ongoing non-flagship initiatives are addressed first, in alphabetical order, and our new flagship initiative, which must be understood in the context of these other initiatives, rounds out the Plan.

New and Ongoing Initiatives

Congressional Requests

Within OPM, Congressional, Legislative, and Intergovernmental Affairs (CLIA) is the focal point for all congressional, legislative, and intergovernmental activities. CLIA educates, responds to, interacts with, and advises Congress and State, local, and tribal officials on programs and policies administered by OPM. CLIA also counsels and advises the Director and other OPM officials on congressional, state, local, and tribal matters.

CLIA is organized into four subgroups that have unique roles and areas of responsibility:

- **Congressional Relations (CR):** CR serves as the principal liaison with Congressional Committees, individual Members of Congress, and as the agency's congressional and legislative liaison with the White House and the Office of Management and Budget (OMB). Working with CLIA's subgroups and OPM program offices, CR designs and implements legislative strategies that support OPM's legislative agenda. While CR takes the lead, it staffs congressional hearings, meetings, and briefings with other CLIA and program office staff.
- **Legislative Analysis (LA):** LA coordinates the development of OPM's annual legislative agenda, including drafting and clearance of legislative proposals. Working with OPM program offices, LA prepares Congressional testimony and letters to OMB or to Congress conveying OPM's views on pending and proposed legislation. Through OMB, LA reviews legislative documents and testimony from other departments and agencies to represent OPM's positions accurately and appropriately. LA also provides technical assistance in drafting legislation to other agencies, Members of Congress, and Congressional committees.
- **Constituent Services (CS):** CS provides services to Members of Congress and active and retired federal employees with questions about retirement, health care, and other OPM programs and policies. CS responds to constituent and federal employee inquiries in a timely, professional, and, when related to private personal information, confidential manner. CS monitors inquiries and develops educational and outreach activities.
- **Intergovernmental Affairs (IA):** IA serves as OPM's principal interface with State, local, and tribal governments. IA develops and maintains relationships with these governments and monitors State legislation and regulations for their impact on OPM programs and policies. IA supports OPM in meeting requirements for tribal consultation, including maintaining and updating the OPM tribal consultation plan and serving as OPM's designated tribal consultation official.

Collaboration, Public Notice, and Public Participation

Websites

As mentioned below under Websites and Web Services, we collaborate internally and with external stakeholders on many web endeavors.

Internally, our Web and Social Media Forum unites professionals from throughout OPM in the common goal of providing current information to users via well-designed websites and web services.

Externally, USAJOBS®, the federal government's official one-stop source for federal jobs and employment information, has long led the way when it comes to collaboration on OPM websites and web services. The USAJOBS® team conducts extensive research and testing to develop products that meet the needs and expectations of the site's users. For example, in designing the recent enhancements discussed below, the team reached out to job seekers from throughout the country, engaged human capital and human resources specialists from across the government, and sought the advice of top usability and design experts. Finally, USAJOBS® is using the collaborative development tool, GitHub, to create the USAJOBS Design System, also discussed below under Websites and Web Services.

USAJOBS® provides a Job Opportunity Announcement (JOA) application programming interface (API) that the public can use to extract open job announcements. We plan to expand offerings to include historical JOA information for public consumption: due to numerous requests over the years for JOAs by year, USAJOBS® will offer users the option to extract historical JOAs based on defined start and end dates.

The USAJOBS® team has also partnered with the CIO's Data Management office to visualize FedScope data in the Federal Civilian Workforce map, a tool that allows users to analyze monthly federal employment data by geographic region, agency, occupation, and demographics.

Partnerships

OPM's strategic objective MG03.03 is to "develop partnerships to access and analyze data." To assess the effectiveness of our approach, we will evaluate the benefits and challenges of using these partnerships to leverage analytic capabilities and use the agency's resources most effectively.

We are:

- Developing collaboration agreements with agencies, academic institutions, and think tanks to leverage data sets, analytic capabilities, and research findings;
- Partnering with inter-agency work groups to identify the most commonly used data and information; and
- Piloting the use of crowdsourcing (as a means to leverage analytic support from an online community) to cultivate analytic partnerships with other Federal and private sector entities, as appropriate

For example, in March 2016, in conjunction with the School of Public Affairs at American University, we hosted the 2016 OPM Research Summit. The two-day event had the ultimate goal of producing a research agenda to guide future studies and policies. The summit brought together academic researchers, federal practitioners, and members of industry to exchange ideas, collaborate, and participate in conversations about research and pressing policy issues within six human capital focus areas:

1. Work/life
2. Benefits
3. Performance management
4. Leadership
5. Employee focus
6. Diversity/inclusion

Public Notice and Public Participation in Decision-making

Our main venue for public participation in OPM's decisions is regulations.gov. As noted below under eRulemaking, we participate in the eRulemaking Advisory Board and use FDMS 4.0, which allows agency users to collect, sort, and publish comments with greater speed and efficiency than ever before. We also make regulatory materials, including proposed rules, available on regulations.gov.

In accordance with the Federal Register notification process, we notify federal agencies, employees, managers, and other stakeholders each time a new proposed, interim, or final regulation becomes available for public comment. The notice briefly explains the change and tells stakeholders where the full text is available for review and comment. The notice may also provide a web link for easy access to the documents.

In addition to the Federal Register and OPM.gov, we use social media to inform the public of any relevant agency activities, news, or updates. We also utilize the Director's Blog for agency-wide or government-wide announcements or other issues of interest. These announcements could include a new initiative, an updated report, a new regulation, or a training session available to the public. Whenever we make these announcements through social media, we strive to communicate through the appropriate language and context for the particular platform and audience.

Declassification

We do not have authority to classify or declassify national security information. Classified information in OPM's possession will be declassified upon proper notification and authorization from the original classification authority. A list of original classification authorities can be found on the White House website. To meet the requirements of the Open Government Directive, we have posted a statement regarding our lack of classification authority on our website.

Freedom of Information Act (FOIA) Requests and Proactive Disclosures

Proactive and Discretionary Disclosure

The online posting of potential FOIA requests is a collaborative effort throughout OPM in keeping with our previous Open Government Plans and the Department of Justice's (DOJ's) open government policies to increase transparency and accountability to the public, as well as to foster a culture within OPM of a presumption of openness coupled with a dedication to maintaining the privacy of individuals and protecting other information not appropriate for or permitted to be disclosed.

Our FOIA Team promotes transparency and openness on all aspects of the review and redacting process, encouraging program offices to segregate as much information as possible. Each reviewer of responsive records is aware of the need to review materials for potential disclosures and seek out discretionary disclosures, provided the disclosure of such information would not cause foreseeable harm and is not protected by applicable privacy and confidentiality laws or other exemptions. We routinely hold meetings prior to the review process to discuss potential areas for disclosure on a case-by-case basis.

Each program office, as the originator of the records responsive to a FOIA request, works with the FOIA Processing Team to determine what, if anything, to post. Senior management, including representatives of the Office of the General Counsel (OGC), also provides insight as to whether the subject matter warrants placement on the website and where the information should be placed. Because much of our documentation carries implications for the privacy of individuals, records are assessed on a case-by-case basis; however, there are some kinds of particularly sought-after data that we routinely release outside of the FOIA process altogether, such as the quarterly release of anonymized data about the federal workforce in FedScope and the ongoing publishing of cybersecurity updates.

Our program offices provide a significant degree of readily available information to the public online, which may reduce the need for an individual to submit a FOIA request. While DOJ has long had a “rule of thumb” for placing records on the web when an agency has received three or more requests for the same records, DOJ has recently advocated for earlier placement of such information online. We at OPM adopt this more responsive approach whenever possible.

We are proactively posting hundreds of records and making it easier for users of our website to locate these records through an online tool we launched in May 2015: “Document Count” allows customers to review all of the latest information we place on OPM’s website and to search for frequently requested information, thereby reducing the need for people to submit FOIA requests to OPM. Indeed, both customers and DOJ have informed us that they encounter a great deal of useful information on our website.

Additionally, our FOIA Council will promote and educate our FOIA Points of Contact (POCs) about openness, especially transparency, while taking into account OPM’s other mandates, which include the need to protect the privacy interests of individuals about whom we maintain records, trade secrets, and the confidentiality of certain processes to maintain their effectiveness.

For our Annual FOIA Report, we are required by DOJ to report data to substantiate proactive and discretionary disclosures made during the year. In the annual report, we also provide narratives that further substantiate activities and actions promoting openness and transparency throughout the agency. Furthermore, the Chief FOIA Officer's report summarizes and lists examples of openness and disclosures. To meet these reporting needs, we revised our FOIA tracking system to allow for data collection on proactive and discretionary disclosures. We will continue to seek out ways to improve our proactive and discretionary disclosure processes, tracking, and reporting to further enhance transparency and accountability while protecting individuals' privacy, respecting confidentiality rules, and safeguarding records that must not be released.

Our FOIA Website

Our FOIA website contains the following sections: overview, appeals, reference guide, reports, open government, electronic reading room, and contacts. The open government section includes a description of our FOIA staffing and organization structure, while the contacts section directs users not only to our FOIA Requester Service Center and FOIA Public Liaison, but also to contacts for background investigations, personnel records, and benefits. The reference guide has basic information on our FOIA process (discussed in greater detail below), and the FOIA reports page provides access to reports dating back to the first quarter of fiscal year 1998 (October-December 1997).

Our FOIA Process

To help the OPM FOIA process operate efficiently, effectively, and openly, the Chief FOIA/Privacy Act (PA) Officer, in conjunction with the OPM FOIA/PA Processing team, conducts assessments and makes revisions to standard operating procedures and other internal procedures. Periodic assessments are done on every aspect of the FOIA process, including disseminating referral and consultation requests, closing out FOIA requests, eliminating redundancy and refining search parameters, reducing non-responsive records, making more timely responses to requesters, and providing status updates. These revisions, as implemented throughout OPM, reduce delays and improve customer service. The OPM FOIA processing team also conducts assessments to revise the process whenever there is an issue that has a negative impact on the referral and consultation process.

Our FOIA standard operating procedures have been revised along with the FOIA flow chart to provide for a more efficient flow in processing requests. The revised process includes procedures for (1) clarifying a request, which helps identify the proper program office or federal agency for the referral or consultation; (2) contacting the proposed program office or federal agency to ascertain whether it will accept the referral or consultation; and (3) following up with either a telephone call or an email to make sure the referral or consultation was received to reduce any delay.

After someone submits a FOIA request, our personnel enter the request into our tracking system. The initial stage of entering a request includes analyzing it to make sure it contains all necessary information and to ascertain whether the records sought are actually produced or maintained by OPM (often, we receive FOIA requests for records that belong to other agencies or that we simply don't create or maintain). This may entail contacting the requester to seek clarification. For the last 18 months, this practice has reduced delays in processing requests, increased assignment of requests to the proper program offices, reduced the need for time extensions, and reduced the potential for appeals that are due to delays caused by assignments to incorrect offices.

We coordinate FOIA requests with the proper program offices and agencies. The process entails contacting program offices to see if a time extension is needed. A time extension can be granted due to the complexity of the request, the need to retrieve records from the National Archives or OPM's archived records, the existence of a backlog that is being reduced, or the need to review voluminous records from a variety of sources. Proper FOIA coordination requires follow up with the subject matter expert or FOIA POC to make sure that the request is processed in a timely fashion, so as to meet the time limit described in the Act. If OPM is not responsible for producing or maintaining the requested materials, the request is referred to the responsive agency and the requester is given notice as to where the records can be located.

In keeping with the Attorney General's guidelines for the use of technology to facilitate the processing of requests, we conducted an assessment regarding what applications could be used to help support the agency's ability to respond to FOIA requests in a timely manner. The analysis showed that the purchase and use of redacting software would greatly reduce the use of resources. We are also reviewing a variety of case management systems designed to store records electronically and allow for the retrieval of responsive records, greatly reducing the present labor-intensive process. The present FOIA tracking system is updated in keeping with the Department of Justice's data requirements for the Annual, Chief FOIA Officer, and Quarterly Reports.

Government-wide Transparency Initiatives

CFDA.gov

The Catalog of Federal Domestic Assistance, cfda.gov, contains program descriptions of federal assistance programs. We report on six programs: Federal Civil Service Employment, Federal Employment Assistance for Veterans, Pathways (employment) Programs for students and recent graduates, Federal Employment for Individuals with Disabilities, and Intergovernmental Personnel Act (IPA) Mobility Program.

Data.gov

OPM's public data listing, located at http://www.opm.gov/data.json, was among the first to be automatically harvested by Data.gov, so it remains up-to-date and accurate. Data.gov provides a user-friendly interface with the information contained in the harvested file.

We use the Project Open Data Dashboard as a feedback tool to manage our success in completing milestones. The Dashboard also communicates OPM's status to other agencies and the public, as they are able to review the dashboard and determine how OPM is performing.

eRulemaking

We participate in the eRulemaking Advisory Board, which shapes agency-wide policies on eRulemaking. The eRulemaking Advisory Board oversaw the release of the Federal Document Management System (FDMS) 4.0, which allows agency users to collect, sort, and publish comments with greater speed and efficiency than ever before. We also make our proposed regulations available on regulations.gov, which allows the public to provide comments quickly and easily via the site's web portal. We respond to these comments in the final published rule.

IT Dashboard

Through the IT Dashboard, federal agencies and the public can view details of Federal IT investments online and track their progress over time. The IT Dashboard display shows the health of all the agency's active major investments based on data received from the agency through its Agency IT Investment Portfolio Summary (formerly Exhibit 53) and Major IT investment Business Case (formerly Exhibit 300) reports. This is a requirement of the agency's IT Capital Planning and Investment Control (CPIC) activities, per OMB Circular A-11, "Preparation, Submission, and Execution of the Budget." The data is updated frequently for each investment.

The IT Dashboard provides transparency on the performance and spending of IT investments across the federal government. If a project is over budget or behind schedule, explanatory details are made available on the IT Dashboard. The IT Dashboard gives the public access to the same tools and analyses that the government uses to oversee the performance of the Federal IT investments. The transparency and analysis features of the IT Dashboard make it harder for underperforming projects to go unnoticed and easier for the government to focus required action.

We participate in the IT Dashboard by providing the IT investment data along with the evaluations from OPM's CIO, who is responsible for the IT investments.

Our agency also participates in the implementation of the Federal Information Technology Acquisition Reform Act (FITARA) and the related information technology (IT) management. The OMB guidance that describes the requirements of FITARA is M-15-14. In addition to providing OMB with specific documentation, agencies are also required to post the implementation plan for FITARA on their public website at [agency].gov/digitalstrategy, and include it as a downloadable dataset in their Public Data Listing. We are in the process of reviewing and posting all of the required FITARA documents on our public website.

Agencies are also required to update their FITARA self-assessment annually and to identify obstacles or incomplete implementations of the Common Baseline responsibilities in the FITARA implementation each April 30. We participate in the annual self-assessment and posting of all publicly required documentation to meet the FITARA requirements specified by OMB.

SAM.gov

In November 2012, we transitioned to the System for Award Management (SAM or sam.gov), which consolidated the capabilities of the Central Contractor Registration (CCR), Online Representations and Certifications Application (ORCA), Federal Agency Registration (FedReg), and the Excluded Parties List System (EPLS), and is used by OPM as a source for vendor and federal agency data and information. On a daily basis, OPM's financial systems interface with SAM.gov to update vendor and federal agency data with the most current information available.

USAspending.gov

USASpending.gov was mandated by the Federal Funding Accountability and Transparency Act (FFATA) to provide transparency on how federal tax dollars are spent. For OPM, this means reporting on contracts. USASpending.gov receives award data from the Federal Procurement Data System–Next Generation (FPDS-NG) system, which is maintained and operated by the General Services Administration (GSA). Contract award information from our procurement system is currently sent to or entered into FPDS-NG.

Our agency profile on USASpending.gov provides information about our contracts, including funds awarded, subaward (i.e., subcontracting) funds, transactions (i.e., amendments and modifications), and recipients of OPM awards, starting with fiscal year 2008 (i.e., October 1, 2007 through September 30, 2008). Once the Digital Accountability and Transparency Act of 2014 (DATA Act) implementation discussed below under Spending Information is completed, our procurement system will provide additional award data sets to USASpending.gov via FPDS-NG.

Grants.gov

Because OPM is not a grant-making agency, Grants.gov does not apply to us.

Open Data

We collect Federal Civilian Human Capital data throughout the federal government. We plan to further our core mission by expanding the core Federal Civilian Human Capital data sets that are collected into areas such as payroll, training, and retirement. We are also exploring publishing the information to the general public, in anonymized form, where applicable.

We also plan to develop and document data standards for the potential expanded data sets and share them throughout the Federal Government along with the data, where applicable.

Our web-based data analysis tool FedScope provides federal human capital data to the general public for consumption or instantaneous online analysis. We plan to expand the data, and consequently the possibilities for analysis, available via FedScope.

Furthermore, we plan to expand our web services and web tools in areas that will increase collaboration as well as efficiency and effectiveness. For example, we are working to create a dedicated open data section of opm.gov that will enable the public to immediately obtain open data information, data to download, analysis, and a public blog for questions, comments, and the sharing of new ideas. The new blog will provide a platform to the general public and the federal sector alike to collaborate, share ideas, and gather feedback.

Open Innovation Methods

As noted above under "Collaboration, Public Notice, and Public Participation," we are developing partnerships to access and analyze data, including through new methods of public participation such as crowdsourcing.

In January 2014, OPM and the White House Office of Science and Technology Policy (OSTP) co-hosted the first ever data jam focused on jobs, labor, and skills. In particular, the data jam addressed the federal science, technology, engineering, and mathematics (STEM) workforce and focused on issues such as identifying skills and talent in real time; tracking flow into, through, and out of career paths; projecting future STEM needs; and fostering diversity in the STEM workforce.

We will continue to hold data jams and similar events to strengthen the partnerships we have developed, further the President's Management Agenda, and address the ever-changing needs of agencies, job applicants, employees, retirees, and retirees' families within the federal space.

Privacy

We provide privacy-related information on our website:

- Basic information about our privacy program
- Full copies of our System of Records Notices (SORNs), as well as our SORN Guide
- Privacy Impact Assessment (PIA) summaries

We report the following to the appropriate agency or Congress:

- **Senior Agency Official for Privacy (SAOP) Reports** are submitted annually to OMB via the Cyberscope application on OMB MAX, a website used by federal agencies to collaborate and report on their activities. This report provides information on agency systems that contain personally identifiable information (PII); PIAs; SORNs; activities of the SAOP; privacy training for agency personnel; privacy-related policies, guidance, processes, and practices; complaints; authorizations to operate (ATOs); and breach response and notification.

- **Annual Privacy Act Reports to Congress** are required by Section 522(a) of the Consolidated Appropriations Act of 2005, which includes the following requirement: "Privacy Officer— Each agency shall have a Chief Privacy Officer to assume primary responsibility for privacy and data protection policy, including . . . (6) preparing a report to Congress on an annual basis on activities of the Department that affect privacy, including complaints of privacy violations, implementation of section 552a of title 5, 11 United States Code, internal controls, and other relevant matters."

- **Biennial Computer Matching Activity Reports to OMB** are required by OMB Circular A-130, Appendix I, Section 4.b, which requires agencies to submit to OMB a Biennial Computer Matching Report on their current computer matching agreements and activities.

Records Management

Our records management webpage provides an overview of our records management program, information about OPM's records management policies and compliance, and contact information.

The Managing Government Records Directive (MGRD) requires agencies to manage all email records in an accessible electronic format by December 31, 2016 and to manage all permanent electronic records in an electronic format by December 31, 2019. Additionally, in 2014, the Federal Records Act (FRA) was amended to require federal employees to copy or forward electronic messages that are federal records from their non-official accounts to official accounts within 20 days. To address these new requirements, we:

- Have begun to update our records management policies, starting with an electronic messaging policy, to incorporate proper records management lifecycle controls, including the implementation of disposition within systems, for our automated systems (subject to litigation holds and other evident constraints on disposition);
- Incorporated the 2014 amendments to the FRA into that policy;
- Are including policies for the retirement and transfer of both electronic and non-electronic records among our updated records management policies, or the retention of such records where warranted;
- Have made the policy decision that electronic records will remain in their native formats except under specific circumstances;
- Are actively pursuing use of the Capstone approach for electronic messaging and drafted a list of Capstone officials and Capstone-level accounts;
- Plan to establish backend controls and disposition rules (as appropriate) in automated systems, starting with the implementation of Capstone for emails, chat sessions, and attachments, which will make those records more easily accessible and retrievable by authorized personnel;
- Are building records management controls into our lifecycle management and systems development lifecycle processes;
- Expect to assess all of our databases for adherence to records management policies;
- Trained our Acting Director and other senior leaders on the Capstone approach and the 2014 amendments to the FRA;

- Will provide training to all agency employees on proper email management; and
- Will continue to schedule records as necessary. Although the nature of OPM's business has remained the same, our operations have moved from a paper to an electronic environment. Our goal is to supersede our existing records schedules with media-neutral schedules to accommodate such changes in practice.

Spending Information

One of our priorities in establishing responsive and transparent financial and budgetary processes is compliance with the DATA Act, OMB Memorandum M-15-12, and FFATA, including FFATA's expanded reporting requirements.

In response to the DATA Act, we have laid the groundwork for implementing the expansion of FFATA by standardizing our data and then publishing it online, linking agency expenditures to contract spending at the programmatic level. This framework, including detailed steps to achieve this standardization and publication, is outlined in our DATA Act implementation plan, which we submitted to OMB as a part of OPM's FY2017 budget submission. While we are still in the assessment and planning phase of DATA Act implementation, our financial, procurement, and IT organizations continue to do the following to support the implementation and monitoring of DATA Act compliance:

- Evaluate OPM's business management areas for required process changes and opportunities for data quality improvements;
- Design and develop changes to policies and procedures; and
- Assess acquisition and financial management workforce training.

Websites and Web Services

Our digital services governance structure is discussed on our Digital Government Strategy websites, on both the Overview (sections 1.2, 2.2, 4.2, and 6.3) and Governance pages. We are modernizing our IT systems and creating the National Background Investigations Bureau (NBIB); as these evolve, we expect to enhance our existing digital governance structure and processes.

Our Office of Communications (OC) reviews web and social media analytics, including those that are available on analytics.usa.gov, as do several OPM components, such as USAJOBS®. The analytics are used to inform our understanding of what interests our users and the best timing, formats, and locations for posting information. We are currently reviewing our customer feedback mechanisms, in line with Goal 2 of our Strategic Plan, to "provide timely, accurate, and responsive service that addresses the diverse needs of our customers."

In June 2015, the Federal CIO released M-15-13, "Policy to Require Secure Connections across Federal Websites and Web Services," which requires agencies to "only provide service through a secure connection" to enhance data security and the privacy of users of federal websites and web services. Agencies must make all existing websites and web services accessible through a secure connection using HTTPS (Hypertext Transfer Protocol Secure) with HSTS (HTTP Strict Transport Security) enabled by December 31, 2016. We met the deadline for HTTPS for all of our domains that are currently in use 11 months early and are on track to meet the deadline for HSTS. Although this was not required, we also made our Intranet HTTPS-only.

Other initiatives include the further development of mobile applications, design and redesign of websites to improve the experience of users on devices other than laptops or desktops, internal collaboration around websites and web services, and greater transparency through a more vibrant Director's Blog.

OPM Alert is our official operating status mobile application. We initially released the app in response to the Digital Government Strategy. It has remained extremely popular. We are developing a similar application for OPM employees and contractors to provide internal status alerts to personal or agency phones in the event, for example, of an active shooter situation or power failure affecting one of our locations.

Since we released our last Open Government Plan in 2014, USAJOBS® has seen a range of improvements, with others on the way, designed to make it easier for job seekers to navigate the site – anywhere, anytime, and on any device – to learn about the federal job market and apply for positions. These enhancements, which were designed through collaboration with a wide range of human resources and IT professionals, as well as other users, are also expected to lead to an increase in the number of completed applications that agencies receive, thereby further enhancing fair and open competition for federal jobs. Among these changes are:

- A switch to responsive design in 2015, so users can easily use the site on their mobile phones, tablets, and other devices. We are also designing new OPM sites using responsive design;
- A tracker that will allow job seekers to follow the progress of their applications from beginning to end;
- The ability to review required documents for a desired position without leaving the job application process; and
- Better management of resumes or other documents throughout the job application process.

Design systems describe the base visual language, using user interface (UI) elements and style guidelines, upon which a website can be built. They also include examples and usage guidelines for new components. In preparing to create the next generation of USAJOBS®, we are branching from the U.S. Digital Services and 18F Web Design Standards to create the USAJOBS Design System, which also acts as a prototyping toolkit, thereby allowing us quickly to explore new ideas in code and iterate our designs. By creating the USAJOBS Design System in GitHub, we are able to collaborate with others within and outside of government on web design best practices.

Our Web and Social Media Forum is a vibrant group of professionals from throughout OPM who are responsible for the content of our web sites and social media presence. They meet frequently to exchange information and collaborate to improve the services OPM provides through these media. They are essential to ensuring the information we provide to our many constituencies, including the public, other agencies, job seekers, and annuitants, is current and accurate.

Also, to improve transparency and communication with the public, we have begun posting to our public-facing Director's Blog more frequently, usually several times a week. Some posts are from Acting Director Cobert herself, while others are provided by guest bloggers, both from inside OPM and from other agencies or the White House. Posts include one on an Historically Black College and University (HBCU) forum held at OPM, another on how OPM is helping agencies combat the Zika virus, and one by National Security Advisor Susan Rice, encouraging Americans to consider careers in public service. We have also stepped up internal communications with a weekly "Around OPM" newsletter and frequent posts to the Director's Corner on the agency's intranet site.

Whistleblower Protection

OPM became certified for the Office of Special Counsel's Whistleblower Protection Act Program in March of 2015. We continue to take the required actions to maintain our current certification, which will remain in effect through March of 2018.

Flagship Initiative: Institutionalizing Records and Information Management (IM)

OPM's Information Management Programs

Our recently-formed Information Management group combines a number of related programs:

- Open government (transparency, collaboration, and participation)
- Records management
- Privacy
- Paperwork Reduction Act (PRA) and forms management (management of information collections)
- Electronic and information technology (EIT) accessibility (Section 508 of the Rehabilitation Act)

By combining these programs, we are able to address information management systematically and holistically, making it easier for OPM offices to achieve transparency, accountability, and efficiency.

Records management is the foundation of open government; an agency that does not properly manage its records can neither be transparent nor make fair, equitable, or full use of what it learns through collaboration or participation. Each of the other programmatic areas within Information Management similarly supports records management and open government:

- **Privacy:** systematic management of records helps support consistent compliance with privacy rules, thereby contributing to the protection of information about individuals (including personally identifiable information, or PII) and, over time, bolstering trust in the agency. In turn, a well-functioning privacy program greatly contributes to an agency's ability to manage its records. Furthermore, meaningful collaboration and participation – two pillars of open government – of employees and external stakeholders are possible only in the context of a relationship built on trust.

- **Management of information collections:** OPM collects information, much of it PII, via completed forms and other instruments. Having control over and insight into how, when, and why information collection instruments are designed and used is in itself a major step toward the full and proper management of agency records. What's more, electronic collection of information using standardized instruments, such as forms, results in structured data that, together with proper restrictions and processes in place to safeguard private or otherwise sensitive information, can be used for purposes of statistical analysis or to enhance transparency through the release of the structured data itself.
- **EIT accessibility:** to achieve the open government goal of transparency, information that agencies share and the systems they use to share the information must be usable by recipients, including those with disabilities. Additionally, many of the techniques used to make documents accessible have value for records management, since these techniques make the structure of documents evident to machines; this opens up opportunities for the use of searching techniques that are not available when documents are unstructured or poorly structured.

Supporting Sustainability through Institutionalization

To support the success and sustainability of these programs, we plan to form a dedicated team within Information Management with the knowledge and skills to conduct the full range of information management functions. We plan to form a network of subject matter experts (SMEs) throughout OPM who will be chosen by their leadership to represent their respective organizations in all of the areas within Information Management.

Additionally, with the help of these SMEs, we plan to review all relevant policies, records schedules, and major guidance annually. Also with the help of these SMEs, we plan to review privacy and PRA documentation at least as often as is federally mandated. All new IM-related policies and formal documentation will go through the formal internal clearance process and, as appropriate, will be reviewed by OMB or the National Archives and Records Administration (NARA).

Since each Information Management team member should be proficient in all of the above areas, we should be better positioned to avoid the twin perennial problems of silos within information management and the tendency to have only one employee with deep knowledge of any given subject. These team members should also be able to leverage their knowledge of one area to benefit their work in other areas. For example, if a program office seeks to create a new form, team members should be able help the office (1) complete the PRA process, if required, and fulfill other requirements for creating and disseminating information collection instruments; (2) address all privacy concerns from the beginning of the process; (3) develop accessible instruments; and (4) schedule the records that will result from use of the instrument before the instrument is put into use, rather than requiring the program office staff to work with four different offices to meet a single collection instrument's information management requirements. This approach will not only be more efficient, but it will also make compliance easier and effective tracking more possible.

In light of this proposed new organization and team, we plan to revise all of our policies in the above areas. The policies:

- Would have a similar structure, making the writing and approval processes easier and improving the policies' usability;
- Would be structured in chapters so that it will be possible to make revisions to a portion of any of the policies without disrupting use of the rest of the policy, and so that each policy will be easily adapted to changes in the law, government-wide policy, or even OPM's structure; and
- Would be reviewed annually and revised, as necessary.

Information Management will only be successful by collaborating closely with all OPM organizations. To that end, we plan to form several agency-wide networks, each with similar goals but designed to address the specific needs of its respective area within Information Management. These new networks would include:

- The **Transparency Advisory Board**, which would periodically review existing agency practices around openness and provide recommendations for improvements.
- The **Records Liaison Officers (RLOs)**, which would have a wide range of responsibilities, including developing organization-specific guidance, working with Information Management staff to ascertain whether their organizations' records are scheduled and whether the schedules remain accurate and appropriate, assisting in training personnel within their organizations, verifying that disposition schedules to their organizations' records are properly applied (including the identification of material that must be preserved notwithstanding the schedule), and participating in audits.
- The **Privacy Liaison Officers (PLOs)**, which would work with OPM's Chief Privacy Officer (CPO) to assess whether employees within their organizations are knowledgeable about and routinely follow all privacy requirements that pertain to their work.
- The **Forms Liaison Officers (FLOs)**, which would perform similar duties to the RLOs, but in the arena of information collections. One of their most important duties would be working with the Forms Officer and CPO to shepherd information collections through the lengthy PRA clearance process when the PRA is applicable.
- Because EIT accessibility requires a variety of skill sets, we plan to have three kinds of **Section 508 Representatives**: those with a deep understanding of websites and documents, those with systems knowledge, and those with a contracting background. These representatives would work with Information Management staff to support compliance with the requirement that the EIT products and services OPM creates and acquires be accessible to all authorized users with disabilities. Besides the Section 508 Representatives, we plan to form a **Section 508 Advisory Board** with members from the Office of the Chief Information Officer (OCIO), Office of Communications (OC), Office of Procurement Operations (OPO), and Office of the General

Counsel (OGC), as well as subject-matter experts (SMEs). The Board would provide leadership, as well as administrative, technical, and program assistance, on EIT accessibility.

Information Management staff would arrange for appropriate training for all advisory board members and liaison officers, who would, in turn, work with Information Management staff to provide all employees within their organizations with the appropriate types and levels of training.

These officers and board members would be chosen by their Associate Directors (ADs) or Heads of Office, and their appointments would be revisited annually to supply appropriate people in these vital roles. ADs and Heads of Office would be free to choose the same individuals for multiple roles, which would allow those so trained the same kind of broad knowledge that Information Management staff members enjoy. Alternatively, different individuals could be chosen to fill various roles, which would afford growth opportunities to a greater number of employees. Providing this flexibility also would allow leaders to take into account their organizations' specific situations (e.g., the size of the organization, expertise of individual employees, or the nature of the work and records). At the same time, standardizing the above roles through policy would reduce the burden of compliance and confusion around who is responsible for what.

Enhancing Openness

Our approach to information management enables openness, while simultaneously making it easier to properly protect information that cannot be shared publicly: records that are in disarray make sharing difficult or even impossible, and increase the likelihood of inadvertent, improper release of information. In contrast, properly organizing and maintaining records leads to "improved performance and promotion of openness and accountability by better documenting agency actions and decisions," as noted by the MGRD, as well as a more rational, systematic release of information.

Much of the documentation produced by Information Management will be made public and even placed on the Federal Register. For example, our records schedules and PRA information collections are released for public comment via the Federal Register process. Using the Federal Register process supports equal opportunity for all interested parties to voice their concerns about and suggestions for changes to OPM's information management practices.

The Information Management section of opm.gov provides information about accessibility, privacy, and records management at OPM, among other related areas. We will revise that section to provide more current and relevant information. We also will continue to post our Privacy Impact Assessments (PIAs) and System of Records Notices (SORNs) on the site and will also post all policy chapters that are appropriate for release, along with links to our records control schedules (hosted on NARA's website). Those chapters for which public release would be inappropriate will be made available to OPM employees via our intranet site.

Participation in policy making within OPM occurs primarily through the clearance process. When we conduct annual reviews of OPM's information management policies, we plan to take comments from advisory board members and liaison officers, as well as from the traditional clearers. For organization-specific documentation, such as information collection instruments and SORNs, we work directly with the program office staff as they research, write, vet, and review their documents. We also engage with OMB as a routine part of many processes, especially regarding information collections.

Similarly, we will collaborate with other federal entities to improve our information management policies, records schedules, information collection instruments, PIAs, SORNs, and other documentation. When we conduct regular reviews of our documentation, we will work with the Federal Records Management Policy Division of NARA and other pertinent government entities to assess their quality and effectiveness, as well as to gather ideas for improvements.

Open government has three pillars: **transparency, collaboration, and participation**. This flagship initiative focuses primarily on **transparency**; we will therefore track the following closely:

- Training of Information Management staff, liaison officers and board members, and other OPM employees in all areas within Information Management so staff are prepared to manage information in ways that foster the systematic and proper sharing of information, while safeguarding personal and other sensitive information;

- The volume and nature of records schedules submitted to NARA for approval by the Archivist of the United States. Records schedules are made public by NARA, and we will disseminate information about the schedules within OPM and on opm.gov;
- Updates to and postings of PIAs and SORNs. To further enhance transparency, we will make these posted documents easier to access and use, for example, by linking PIAs to the related SORNs;
- Forms and other information collection instruments to determine whether our internally-facing and externally-facing forms libraries are current, so employees and the public alike will know with confidence what information we collect; and
- Conformance to accessibility standards so all authorized users have access to the appropriate information and IT systems at OPM, regardless of any disabilities they might have.

Since all of Information Management's work requires significant **collaboration** across OPM and often with OMB or NARA, tracking accomplishments of this flagship initiative will allow us to evaluate the state of collaboration around the management of OPM's information. Submissions to the Federal Register are already tracked; this data reveals information about public **participation**.

Again, information management is the foundation for an open government, particularly regarding transparency and accountability. By modernizing our information management policies, processes, teams, and decisions, we are preparing OPM for long-term success by enhancing the agency's transparency and accountability, while safeguarding the privacy of the millions of individuals we serve daily.

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CIO-02646-09/2016