



Office of Management and Budget

Privacy Impact Assessment for the Qualtrics Employee Participation Platform

Agency Chief Information Officer

Date

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Senior Agency Official for Privacy

12/18/23

Date

I. System Overview

1.) Describe the purpose of the system, collection or tool.

Qualtrics is a web-based application that allows users to create surveys and collect, analyze, and store data produced from those surveys. Qualtrics has achieved FedRAMP authorization, ISO 27001 certification, and compliance with GDPR. Over 20 Federal agencies have approved use of Qualtrics.

USDS has a need to survey, collect, analyze, and report on its employee experience. The requested use cases are:

- Assessing USDS employee health and engagement; and
- Measuring criteria per conditions of a remote work pilot authorized by the Director of Office of Management and Budget (OMB).

USDS requests use of Qualtrics Employee Experience Platform. As described in the September 2022 FedRAMP Security Assessment Report, the Qualtrics Employee Experience Platform “[a]llows agencies to measure and manage employee engagement by creating feedback loops for relevant aspects of public sector employment, such as Manager Feedback, Training Feedback, Employee Engagement, and Employee Pulse programs.” This PIA is limited only to the use and authorization of the Employee Experience Platform.

The below lists the actions USDS intends to take in Qualtrics:

- Construct and distribute surveys to participants, and then manage and analyze individual participant responses
- Create reports that present the results and trends to allow for intelligent action planning
- Test surveys to ensure the design is effective and thorough survey design/methodology
- Study and improve experiences by deploying Relationship Net Promoter Score (NPS), Transactional NPS, Satisfaction, and Feedback programs
- Measure and manage employee experiences by creating feedback loops for relevant aspects of public sector employment, such as Manager Feedback, Training Feedback, Employee Engagement, and Employee Pulse programs
- Perform natural language processing, statistical and predictive analysis of responses
- Build dashboards which provide visual displays of the data collected from surveys
- Host a library where USDS can store question templates, graphics, and messages used in building surveys and sending messages to participants
- Tag questions and linkages to conduct both vertical and horizontal analyses on surveyed data

2.) Provide a data map or model illustrating how information is structured or processed by the system throughout the life cycle. Include a brief description of data flows.

Data Structures:

- When a user builds a survey, the survey questions are stored in the Qualtrics platform. Each question is stored as a column within a unique spreadsheet saved in the platform.

- When respondents answer voluntary and self-reported information in the survey, responses are entered into a cumulative spreadsheet. Responses are recorded below the survey question or column.
- The survey administrator (those with access to view raw data) will remove responses that are less than 10 for a given population – this is to reduce risk of identifying respondents and protect anonymity.
- Qualtrics dashboarding will be adjusted so analyses cannot be performed or displayed on responses not in excess of 10 respondents.

II. Authority and Purpose

1.) What is the legal authority to collect, use, maintain, and share information in the system?

5 CFR § 250.302 - Survey requirements

III. Information Types

1.) What information will be collected, maintained, used, and/or disseminated? Select all that apply:

Identifying Numbers			
Social Security Number	No	Truncated or Partial Social Security Number	No
Driver’s License Number	No	Vehicle Identifier	No
Patient ID Number	No	File/Case ID	No
Student ID Number	No	Credit Card	No
Passport	No	Alien Registration	No
Employee ID Number	No	Employer ID Number	No
Professional License Number	No	Financial Account	No
Taxpayer ID Number	No	Credit Card	No
Medical Record	No	Any Other ID (specify)	No

Contact Information			
Personal Mobile Number	No	Business Phone Number	No

Personal Email Address	No	Business Email Address	No
Home Phone Number	No	Business Mailing Address	No
Home Mailing Address	No	Any Other Contact Information (specify)	No

Work Related Data (WRD)			
Occupation	No	Job Title	No
Work Email Address	No	Work Address	No
Work Phone Numbers	No	Salary	No
Student ID Number	No	Procurement or Contracting Records	No
Employment Performance Ratings or other Performance Information	No	Work History	No
Other Information (specify) Yes: General work location, whether remote or DC-based (telework) status; Leadership Role or Individual Contributor Role Community of Practice (organization within USDS)			

Biographical Information			
Name	No	Gender	Yes
Date of Birth	No	City or County of Birth	No
Country of Birth	No	Zip Code	No
Citizenship	No	Military Service Information	Yes
Spouse Information	No	Academic Transcript	No
Marital Status	No	Resume or Curriculum Vitae	No
Mother's Maiden Name	No	Children or Dependent Information	No
Any Other (specify) - Yes: Racial and ethnic category - Sexual orientation - Disability (cognitive or physical) Age range			

Biometrics			
Fingerprints	No	Height	No
Hair Color	No	Eye Color	No
Video Recording	No	Audio Recording	No
Signatures	No	Photos	No
Weight	No	Any Other (specify)	No

Active Directory/Device Information			
User Name or User ID	No	IP Address	Yes
Device Identifier or Serial Numbers	No	Any Other (Specify)	No

IV. Collecting Information

1.) How is information in this system collected?

Data are collected by respondents accessing the survey and self-reporting information in Qualtrics.

V. Information Use

1.) Will information in the system be retrievable using one or more of the data elements listed in Section III? If yes, will the information be retrieved?

Yes, voluntary self-identified survey information will be retrieved via Qualtrics reporting. If there are fewer than 10 responses in a given category or question the data would not be analyzed or reported on. Each survey is confidential and no answer can be linked to any individual. Responses are analyzed in groupings of no less than 10 responses to protect anonymity.

2.) If the information in the system is retrieved using one or more of the identifiers, what OMB System of Records Notice (SORN) covers the information?

OPM/GOVT-6 Personnel Research and Test Validation Records July 19, 2006, 61 FR 36919; modification published November 30, 2015, 80 FR 74815.

VI. Access and Sharing

- 1.) With which internal OMB offices is the information shared? For each office, what information is shared and for what purpose?

Response data are shared with OMB USDS, OMB MOD, and OMB IT to perform automatic records capture where files are exported into an OMB-approved system for records management compliance. The data exports will use text-based, human-readable file formats (e.g. .txt, .csv, json). Responses are analyzed in groupings of no less than 10 responses to protect anonymity (anything less than 10 are deleted from survey response data). The export process will be hosted on an OMB-approved environment, with access limited to those serving in system admin roles. Only USDS systems admins will have access to raw data – this includes a supervisory digital services expert in Talent. General USDS employees, including supervisors, will have access to only aggregate data.

- 2.) How is the information shared within the requesting office or division?

Automatic records capture built via an OMB.EOP.GOV account.

- 3.) With which other organizations (including other EOP components) or individuals is the information shared?

The mailbox OMB.EOP.gov is administered by PITC's Community of Interest (COI) Management System.

- 4.) How is the information shared with other organizations or individuals?

Indirectly via an OMB.EOP.gov mailbox

VII. Transparency

- 1.) How are individuals notified as to how their information will be collected, used, and/or shared within this system/collection?

Notified via survey introduction - This survey is anonymous and no answer can be linked to any individual. Responses will be analyzed in groupings of no fewer than 10 responses to protect

anonymity. Individual responses will be permanently destroyed once analysis is complete, in accordance with General Records Schedule 2.2, item 020.

2.) Is a SORN required? If so, explain how the information in this system is limited to the use specified in an existing SORN. If there is no existing SORN, please indicate that.

OPM/GOVT-6 Personnel Research and Test Validation Records July 19, 2006, 61 FR 36919; modification published November 30, 2015, 80 FR 74815.

VIII. Individual Participation

1.) Is the information collected directly from the individual?

Yes.

2.) Is the collection mandatory or voluntary? If voluntary, what opportunities do the individuals have to decline to provide information?

Voluntary and self-reported. The individual may choose not to answer questions or skip questions or not to take the survey at all.

3.) Do individuals have an opportunity to consent to a particular use of their information? If so, how to they provide consent for a particular use? (Attach proposed consent forms or other documentation).

No.

IX. Data Minimization

1.) What steps were taken to minimize the collection of PII in the system, collection, or tool?

All data are self-reported and voluntary. The Qualtrics Employee Participation Platform provides discretion in the amount of information collected by survey. USDS's use case is limited only to the Employee Participation Platform. The surveys to be conducted will entirely voluntary and anonymized. The PII in the tool is limited to those fields identified in Part III above. Furthermore, the Employee Participation Platform allows USDS to limit access to respondent information below a specific survey sample that could potentially be used to

identify the responder. USDS intends to limit the survey response number for any given field to 10 individuals. Additionally, USDS has placed additional safeguards to who can access the raw data.

2.) Data Quality and Integrity

- 1.) How is data quality ensured throughout the information lifecycle and business processes associated with the use of the information?

Respondents for a survey are assigned unique, hard-to-guess URLs and are instructed not to disclose their URL to others or share with a personal device. The Qualtrics platform does not allow for responses to be edited by anyone other than the respondent.

3.) Retention

- 1.) What is the applicable records schedule?

Legal authority, GRS 2.2: Employee Management Records particularly item 020. Workforce and succession planning records (studies and surveys). Temporary – destroy 3 years after issuing each new plan, but longer retention is authorized for business use.

- 2.) What are the retention periods for the information?

Temporary – destroy 3 years after issuing each new plan, but longer retention is authorized for business use.

XII. Security

- 1.) What types of administrative safeguards protect the information?

Contingency Plan User manuals for the system Rules of Behavior Non-Disclosure or other contractual agreement Other: Administrative access is limited to only USDS systems admins – all other users will have restricted access to the platform and generally only able to take surveys vs. administer them.

- 2.) What types of physical safeguards protect the information? Guards Identification Badges Biometric Cameras Physically secured space with need to know access Other: Qualtrics implements perimeter defense, firewall systems, and best practice data center controls.

3.) What types of technical safeguards protect the information? User Identification Firewall Virtual Private Network (VPN) Multi-factor Authentication (MFA) Passwords Encryption De-Identification Anonymization

4.) What monitoring, recording, and auditing safeguards are in place to prevent or detect unauthorized access or inappropriate use of the information?

The Qualtrics system will only support employee workforce and succession planning records (studies and surveys), with that, the user-based is extremely limited to the Talent (primarily Talent Management) group within OMB USDS. While all OMB USDS employees will have a participant account (enables them to take surveys). A very small subset of OMB USDS employee will be able to design surveys, and only systems administrators will have access to view individual data.

Qualtrics will work with USDS to deploy both MFA and SSO options. Those taking surveys will not need to create accounts – they access the survey via a link. Those with admin access or creating surveys will have to sign in using MFA and SSO options we work with Qualtrics to deploy.

5.) Is this system/tool hosted by a Cloud Service Provider (CSP)?

a. If yes, which one?

Yes, GovCloud - the Qualtrics cloud service is operated with an acceptable level of security for the intended use case. Some of the key factors include:

- support of single sign-on authentication, with option for an additional layer of multi-factor authentication
- encryption of data in transit using HTTPS/HSTS and data isolation option for unique encryption keys
- use of GovCloud for federal government data and processing
- in-house 24/7 security operations center and continuous network monitoring
- certifications: ISO 27001: information security best practices in asset management, access control, cryptography, and network security

b. If yes, has the system obtained a FedRAMP Authorization?

FedRAMP certified for U.S. federal security compliance based on NIST 800-53

4.) Training

1.) What privacy training have users of this system/collection taken?

OMB Required Information Security Training; EOP Cyber Awareness Training