

GENERAL SERVICES ADMINISTRATION
Washington, DC 20405

CIO 2231.1
May 12, 2020

GSA ORDER

SUBJECT: GSA Data Release Policy

1. Purpose. This Order provides General Services Administration's (GSA) policy on releasing information relating to GSA employees, contractors, and others on whom GSA maintains information described herein.
2. Cancellation. This Order cancels and supersedes [CIO 9297.1 GSA Data Release Policy](#), dated March 18, 2015.
3. Revisions.
 - a. Directive number changed to a new series of classification numbers for "Privacy Act and Personally Identifiable Information (PII)" related policies,
 - b. Outdated links updated,
 - c. Language simplified in several paragraphs throughout the document, and
 - d. "Home Address" and "Emergency Contact Information," added to listing (paragraph 7.b).
4. Background. Under this Order, GSA continues to comply with the Freedom of Information Act (FOIA) and the Privacy Act, which require a balance between the public's right of access to Federal Government documents and the privacy rights of Federal employees, contractors, and others associated with the Federal Government, whose records are maintained by Federal agencies.
5. Applicability. This Order applies to:
 - a. All GSA employees and contractors that release GSA records to the public via the FOIA or via other records requests and those who collect, maintain, disseminate, use, manage, or come in contact with personally identifiable or sensitive information owned by GSA.

b. The Office of Inspector General (OIG) to the extent that the OIG determines it is consistent with the OIG's independent authority under the Inspector General Act and it does not conflict with other OIG policies or the OIG mission.

c. The Civilian Board of Contract Appeals (CBCA) to the extent that the CBCA determines it is consistent with its independent authority under the Contract Disputes Act and other authorities and it does not conflict with the CBCA's policies or mission.

6. References. The following informational material is relevant to this topic:

a. Privacy Act of 1974, as amended: <http://www.justice.gov/opcl/privacy-act-1974>

b. Freedom of Information Act (FOIA): <https://www.justice.gov/oip/doj-guide-freedom-information-act-0>

c. OPM Regulations on Personnel Records, 5. C.F.R. Part 293, generally; and Sec. 293.311, specifically: <http://www.gpo.gov/fdsys/pkg/CFR-2012-title5-vol1/pdf/CFR-2012-title5-vol1-part293.pdf>

7. Releasability of GSA Individual Employee Information.

a. Releasable Information. The following information may be released to the public at the individual record level for GSA employees, unless disclosure would violate the Privacy Act or would constitute a clearly unwarranted invasion of personal privacy. GSA's data release policy is applied when responding to FOIA and other requests for individual level data at the agency level:

(1) Name;

(2) Present and past position titles and occupational series;

(3) Present and past grades;

(4) Present and past annual salary rates (including performance awards or bonuses, incentive awards, merit pay amount, Meritorious or Distinguished Executive Ranks, and allowances and differentials). Performance awards or bonuses may be withheld when their disclosure would enable the requester to deduce an individual's performance appraisal;

(5) Present and past duty stations (includes room numbers, shop designations, or other identifying information regarding buildings or places of employment); and

(6) Position descriptions, identification of job elements, and those performance standards (but not actual performance appraisals) that the release of which would not interfere with law enforcement programs or severely inhibit agency effectiveness. Performance elements and standards (or work expectations) may be withheld when they are so intertwined with performance appraisals that their disclosure would reveal

an individual's performance appraisal.

b. Non-Releasable Information. Unless release of the information is permissible pursuant to one of the twelve (12) Privacy Act exceptions as specified in [5 U.S.C. § 552a\(b\)](#) or exemptions as specified in [5 U.S.C. § 552a\(j\) and \(k\)](#), the following information may not be released to the public or other persons other than the employee:

- (1) Social Security Number (SSN)
- (2) Date of birth
- (3) Disability status
- (4) Race
- (5) National origin
- (6) Sex
- (7) United States citizenship status
- (8) Home address
- (9) Emergency contact information
- (10) Annuitant status
- (11) Federal Employees Health Benefits Program data
- (12) Federal Employees Life Insurance data
- (13) Federal Employees Retirement System coverage
- (14) Federal Civil Service Retirement System service
- (15) Retirement plan
- (16) Veterans' preference
- (17) Educational level
- (18) Instructional program
- (19) Year degree attained
- (20) Performance rating level

(21) Creditable military service

(22) Current appointment authority (law, executive order, rule, regulation, or other basis that authorizes the employee's most recent conversion or accession action)

(23) Legal authority (the law, executive order, rule, regulation, or other basis that authorizes the appointing officer to effect a personnel action on an employee)

(24) Previous retirement coverage

(25) Dynamics category (accessions, separations, and terminations. This category is a data element generated by analysts for internal OPM use to more succinctly categorize accessions and separations)

(26) Award Justification

Individuals should consult with their supervisors and the Office of General Counsel if there are any questions regarding whether information should be released.

8. Releasability of Aggregated GSA Employees' Personal Information. GSA will generally not disclose ordinarily releasable information where the data sought is a list of names, present or past position titles, grades, salaries, performance standards, and/or duty stations of Federal employees which, as determined by the official responsible for custody of the information:

(1) Is selected in such a way that would reveal more about the employee the disclosure of would violate the Privacy Act or would constitute a clearly unwarranted invasion of personal privacy; or

(2) Would otherwise be protected from mandatory disclosure under an exemption of the FOIA.

9. Releasability of GSA Employee Information in Occupations Deemed Sensitive in Nature. OPM has designated certain occupations as sensitive in nature. Names and duty stations of individuals in those job series/occupations are not releasable to the public. The names and duty stations of individuals in the following sensitive occupations may not be released, except when required by law (e.g., court order). Release of information is handled on a case by case basis to determine if the information must be released. Individuals should consult with supervisors and the Office of General Counsel if there are any questions regarding whether information should be released.

a. 1802, Compliance inspection and support

b. 1801, General inspection, investigation, and compliance

- c. 1810, General investigating
- d. 0930, Hearings and Appeals Officer
- e. 1811, Criminal investigating
- f. 1899, Investigating Student Trainee

10. Releasability of GSA Agency/or Program Summary Level Data. GSA periodically issues summary level reports and statistics relating to agency programs and activities. Information in summary or aggregated form may not be released when individual's or individuals' non-releasable personal information could be discerned from the information contained in the summaries/reports.

11. Signature.

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BETH ANNE KILLORAN
Deputy Chief Information Officer
Senior Agency Official for Privacy
Office of GSA IT