

### Privacy Impact Assessment of Research Recruiting Application

#### **Program or application name:**

Research Recruiting Application

#### **System Owner:**

Board of Governors of the Federal Reserve System's (Board) Research and Statistics Division

#### **Contact information:**

System Manager: Debbie Flores, Chief, Administration Section,

Research and Statistics

Organization: Board of Governors of the Federal Reserve System

Address: 20th Street and Constitution Avenue, N.W.

Washington, DC 20551

Telephone: (202) 452-2377

IT System Manager: Kenneth Gross, Chief, Application Design &

Development Section, Research and Statistics

Organization: Board of Governors of the Federal Reserve System

Address: 20th Street and Constitution Avenue, N.W.

Washington, DC 20551

Telephone: (202) 452-3629

#### **Description of the IT system:**

The Research Recruiting application is a Board database-driven internal web application. It is used to identify, track, screen, and select individuals ("applicants") for economist and research assistant (RA) positions at the Board.

Applicants can be members of the public, government employees, former Board employees, or Bank employees. The Research Recruiting application was specifically developed to support the recruitment and related business processes for the economist and RA job families. The Research Recruiting application interfaces with the Board's Taleo Recruiting system to allow economist applicants to provide self-identification information and to create applicant profiles to complete the hiring process and for use in the Board's onboarding process.

### 1. The information concerning individuals that is being collected and/or maintained:

The Research Recruiting application stores the following personal information economist and RA applicants at the Board:

- a) Name;
- b) Telephone number;
- c) Email address;
- d) Resume, cover letter, transcript, and other related documents (if submitted by applicant);
- e) Letters of recommendation;
- f) Citizenship status;
- g) Race\* (if submitted by the applicant);
- h) Ethnicity\* (if submitted by the applicant); and
- i) Gender\* (if submitted by the applicant).

For economist and RA applicants who are selected for an interview, the Research Recruiting application also stores a copy of the applicant's completed Board FR 28 application for employment. The application for employment collects the following additional information:

<sup>\*</sup>RA applicants only. This information is collected by a different system for economist applicants (see below).

- a) Detailed education/work history including contact information for past supervisors;
- b) Certifications/professional licenses;
- c) References, including name, email address, and phone number of the applicant's references;
- d) Criminal background;
- e) Credit/debt delinquencies;
- f) Forced job separation/resignation;
- g) Applicant address;
- h) US or DC annuity information;
- i) Relationship with Board employees or banking institution employees;
- j) Unique identifier for e-signature purposes; and
- k) Ownership of financial instruments.

For RA applicants, the following pre-hire conflict of interest screening information is collected prior to an interview. For economist applicants, this information is collected when a position has been offered:

- a) Financial interests (type and ownership);
- b) Relatives in related business (company or entity, position, and relationship);
- c) Outside positions (name of organization, employer, or business, and position); and
- d) Other potential conflicts.

Finally, if an applicant is offered a position, the Research Recruiting application stores the following additional information:

- a) Salary;
- b) Grade; and
- c) Sign-on bonus (if applicable).

In order to obtain a Request to Self-Identify, which is stored within Taleo Recruiting, the Research Recruiting application also forwards economist applicant names and emails to the Board's Taleo Recruiting system for economist candidates who have reached the interview stage. The Request to Self-Identify collects gender, ethnicity, and race information (if provided), as outlined in the Taleo Recruiting System PIA.

All hires ultimately must be processed through Taleo Recruiting in order to receive an offer. Therefore, for economists and research assistants who accept a position with the Board, a copy of their application and resume is uploaded into Taleo Recruiting and associated with their profile in Taleo Recruiting. For economists and research assistants who accept a position, a copy of the FR 28 application and resume resides in both Taleo Recruiting and the Research Recruiting application.

#### 2. Source(s) of each category of information listed in item 1:

The information collected and maintained in the Research Recruiting application is generally provided by the applicant (or, for letters of recommendation, the recommender) to a shared email inbox or through the Job Openings for Economists (JOE) website, which is operated by the American Economic Association. All information is subsequently entered into the Research Recruiting application by staff or contractors. For economist applicants on the new PhD job market, CVs may be downloaded directly from the applicant's academic institution.

#### 3. Purposes for which the information is being collected:

The information collected and maintained in the Research Recruiting application is used to support the process for identifying, tracking, interviewing, and selecting applicants for economist and RA positions at the Board. The applicant's race, ethnicity, and gender information, which the applicant has the choice to provide, is submitted to the Board's Office of Diversity and Inclusion (OD&I) for reporting purposes. OD&I maintains the information consistent with the standards set forth in the System of Records entitled BGFRS-24 "FRB – EEO General Files." The race, ethnicity, and gender information is not made available to the hiring managers. The information collected by the pre-hire conflict of interest screening form is collected in order to manage and document compliance with the Board's ethics requirements. If the applicant is hired, the Board's Ethics Program will also maintain the pre-hire conflict of interest screening form in the employee's ethics file if deemed necessary, which is maintained consistent with the System of Records entitled BGFRS-41 "FRB—Ethics Program Records."

#### 4. Who will have access to the information:

Access to the information maintained in the Research Recruiting application is limited to authorized users (Board employees and contractors) who have a need to know the information for official business purposes. In addition, this information may be disclosed for the purposes set forth in the System of Records entitled

BGFRS-1 "FRB—Recruiting, Placement, and Onboarding Records." The applicant's race, gender, and ethnicity information, if provided by the applicant, may be disclosed for the purposes set forth in the System of Records entitled BGFRS-24 "FRB—EEO General Files." The pre-hire conflict of interest screening form may be disclosed for the purposes set forth in the System of Records entitled BGFRS-41 "FRB—Ethics Program Records." Relevant application records for applicants who are hired are kept in the employee's official personnel file and may be disclosed for the purposes set forth in the System of Records entitled BGFRS-4 "FRB—General Personnel Records."

## 5. Whether the individuals to whom the information pertains have an opportunity to decline to provide the information or to consent to particular uses of the information (other than required or authorized uses):

Individuals applying for an economist or RA position have a right to decline in proceeding with the recruitment process and have their records removed from the system. However declining to proceed with the recruitment process may result in the Board's inability to consider the individual for the economist or RA position.

### **6.** Procedure(s) for ensuring that the information maintained is accurate, complete and up-to-date:

Applicants generally provide most of the information stored in the Research Recruiting application and are expected to contact the Board if any of the information requires updating. Authorized Board staff in the economics divisions have the capability to update or change information if they become aware of a change or if a change is requested by the job applicant or their references.

#### 7. The length of time the data will be retained and how will it be purged:

The official retention period for application records for applicants is two years. Staff have reviewed the retention period and are working with Board records staff to propose a three year retention period for the application records and a five year retention period for the evaluation forms associated with economist job applications, to better meet business needs. Until the proposed records retention periods are approved through an official retention schedule, the Board will maintain the application records indefinitely. Relevant application records for applicants who are hired are kept in the employee's official personnel file and maintained in accordance with the System of Records entitled BGFRS-4 "FRB—General Personnel Records." The applicant's race, gender, and ethnicity

information, if provided by the applicant, are maintained in accordance with the System of Records entitled BGFRS-24 "FRB—EEO General Files." The pre-hire conflict of interest screening form may be maintained in accordance with the System of Records entitled BGFRS-41 "FRB—Ethics Program Records."

## 8. The administrative and technological procedures used to secure the information against unauthorized access:

The Research Recruiting application has the ability to track individual user actions within the system. The audit and accountability controls are based on NIST and Board standards which, in turn, are based on applicable laws and regulations. The controls assist in detecting security violations and performance or other issues in the Research Recruiting application.

Access to the Research Recruiting application is restricted to authorized users who require access for official business purposes. Users are classified into different roles and common access and usage rights are established for each role. User roles are used to delineate between the different types of access requirements such that users are restricted to data that is required in the performance of their duties. Periodic assessments and reviews are conducted to determine whether users still require access, have the appropriate role, and whether there have been any unauthorized changes.

# 9. Whether a new system of records under the Privacy Act will be created. (If the data are retrieved by name, unique number or other identifier assigned to an individual, then a Privacy Act system of records may be created):

The Research Recruiting application is covered by an existing System of Records entitled BGFRS-1 "FRB—Recruiting, Placement, and Onboarding Records." The applicant's race, gender, and ethnicity information, if provided, is maintained under an existing System of Records entitled BGFRS-24 "FRB—EEO General Files." If an applicant is hired, relevant application records will be maintained under BGFRS-4 "FRB—General Personnel Records" and the pre-hire conflict of interest screening form may be maintained in accordance with the System of Records entitled BGFRS-41 "FRB—Ethics Program Records."

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Raymond Romero	Date
Senior Agency Official for Privacy	
	1/20/70
/signed/	4/30/19
Sharon Mowry	Date
Chief Information Officer	