



Privacy Impact Assessment of Taleo Recruiting System

Program or application name:

Taleo Recruiting System (Taleo Recruiting)

System Owner:

Board of Governors of the Federal Reserve System's ("Board") Management Division

Contact information:

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Description of the IT system:

The Taleo Recruiting system is a cloud-based, FedRAMP certified Software as a Service ("SaaS") application, which is hosted and maintained by Oracle Corporation ("Oracle"). Taleo Recruiting is used by Board staff (employees and

contractors) to identify, track, screen, and select individuals for positions at the Board. Individuals (“applicants”) interested in a position at the Board (other than for research assistants, summer law clerks, and some economist positions) use Taleo Recruiting to apply for the position. The applicant has the option to apply for a specific position(s) for which the Board is currently hiring or to express a general interest in employment at the Board and have his/her information maintained in consideration for a future vacancy. The information contained within Taleo Recruiting also informs reports forwarded to relevant personnel within the Board.

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

Taleo Recruiting collects and maintains different information on applicants depending on the applicant’s stage in the application process. Taleo Recruiting also collects and maintains information on current Board employees (“internal applicants”) in order to permit those employees to apply for other positions at the Board.

For all applicants, Taleo Recruiting collects and maintains certain “Profile Information” consisting of:

- a) User name (created for use in the Taleo Recruiting system);
- b) Source (how applicant heard about the position);
- c) Name;
- d) Personal email address;
- e) Personal phone number;
- f) Address;
- g) Citizenship;
- h) Willingness to travel;
- i) Date of availability;
- j) Resume, cover letter, transcript, or other related documents (if provided by the applicant);
- k) Race (if provided by the applicant);
- l) Ethnicity (if provided by the applicant); and
- m) Gender (if provided by the applicant).

For internal applicants, in addition to the Profile Information, Taleo Recruiting also collects and maintains supplemental Profile Information consisting of employee name, employee number, work phone and email address, and current employing division.

When an applicant is selected for an interview, the applicant is required to fill out the Board's FR 28 application for employment and a pre-hire conflict of interest screening form. Taleo Recruiting maintains the employment application information provided by the applicant, which consists of (in addition to the Profile Information):

- 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.

Taleo Recruiting also collects the following pre-hire conflict of interest screening information prior to an interview:

- 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 the applicant is offered a position, Taleo Recruiting collects and maintains offer information consisting of:

- a) Start date;
- b) Annualized salary;
- c) Preferred first name and suffix;
- d) Title and grade of the position;
- e) Employment source;
- f) Certain Board job data, such as department, job code, and pay group;

- g) Relocation information (if applicable); and
- h) Sign-on bonus (if applicable).

While Taleo Recruiting does not generally collect information for economists (which is processed by the Research Recruiting application, covered under the Research Recruiting Application PIA), when an economist candidate reaches the interview stage, the Research Recruiting application does forwards the economist applicant's name and email address to Taleo Recruiting. This creates a profile for the economist candidate in Taleo Recruiting. This information is forwarded in order to obtain a Request to Self-Identify, which collects gender, ethnicity, and race information, if provided by the economist applicant. The Request to Self-Identify is stored within Taleo Recruiting and associated with the profile of the economist applicant in Taleo Recruiting.

All Board hires ultimately must be processed through Taleo Recruiting in order to receive an offer. Therefore, at the offer and hire stage, some additional information is collected from research assistants and summer law clerks in order to generate a profile in Taleo Recruiting. Economists have a previously generated Taleo Recruiting profile from the interview stage. For this group of hires (economists, summer law clerks, and research assistants) a copy of the hire's application and resume is also uploaded and associated with the hire's Taleo Recruiting profile. 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 Taleo Recruiting is generally provided by the applicant or the recruiter (Board staff), although some information may come from other sources such as educational institutions or references. In addition, for internal applicants, the supplemental Profile Information is automatically imported into Taleo Recruiting from the Board's personnel system.

3. Purposes for which the information is being collected:

The information collected and maintained in Taleo Recruiting is used to assist the Board in identifying, tracking, screening, and selecting applicants for positions at the Board. The Board's Human Resources function also uses Taleo Recruiting to produce reports regarding the source of candidates for positions, the timeliness of

each process step, and the status of filling open Board positions. The applicant's race, ethnicity, and gender information, which the applicant has the choice whether 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 and it is deemed necessary, the Board's Ethics Program will also maintain the pre-hire conflict of interest screening form in the employee's ethics file, 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 Taleo Recruiting is limited to authorized users, which consist of Board staff and Oracle's customer support personnel who have a need to know the information for official business purposes. Access to the information is restricted to that which is required in the performance of the user's duties. 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." If the applicant is hired, 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 may elect not to apply for a position at the Board using Taleo Recruiting. However, declining to apply through Taleo Recruiting may result in the Board's inability to consider the individual for the position. For internal

applicants, the supplemental Profile Information is automatically generated. Internal applicants do not have an opportunity to decline to provide the information but do have the ability to edit the information in certain instances (such as their name, work phone, and email address) and also to decline to provide any additional Profile Information.

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

Both external and internal candidates may view/edit their general profile to make updates. Because the information maintained in Taleo Recruiting is about individuals seeking employment with the Board, the individual applying for employment is generally responsible for the accuracy, completeness, and timeliness of the information the individual submits through Taleo Recruiting. Once an application is submitted to the Board for a position, neither an external nor internal candidate will be able to make updates to the application information, other than their general profile information. For internal applicants, the supplemental Profile Information is automatically updated through the interface between Taleo Recruiting and the Board's personnel system. Board staff have the capability to update information if the applicant makes Board staff aware that his/her information has changed.

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 to better meet business needs. Until the proposed records retention period is approved as part of 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, may be 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 Taleo Recruiting system 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 Taleo Recruiting system.

Access to the Taleo Recruiting system 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 Taleo Recruiting system 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 Files.”

Reviewed:

/signed/
Raymond Romero
Senior Agency Official for Privacy

4/30/19
Date

/signed/
Sharon Mowry
Chief Information Officer

4/30/19
Date