



Privacy Impact Assessment for
USA HireSM Program

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Abstract

The USA Hire Group in the Federal Staffing Center, in the Human Resource Solutions Division of the Office of Personnel Management (OPM), operates the USA Hire Program. The program employs two separate but related information technology systems, USA Hire and USA Hire PF2, to complete required online assessments which are used as criteria to determine their qualifications for positions for which they have applied. This Privacy Impact Assessment is being conducted because the program, and the systems it employs, collects, maintains, and uses personally identifiable information about individuals who complete required online assessments as part of their applications for Federal government positions.

Overview

OPM created the USA HireSM program specifically to meet the hiring needs of Federal government agencies. OPM provides USA HireSM services to other agencies, on a reimbursable basis, through inter-agency agreements under the provisions of the Revolving Fund, 5 U.S.C. §1304 (e) (1), which permits OPM to perform human resources management services for agencies on a cost-recovery basis. The program employs two separate but related information technology systems, USA Hire and USA Hire PF2 ("PF2"), to more easily identify the best job candidates and improve the efficiency of their assessment process. The systems are used for the construction, analysis, and validation of written tests and other assessment instruments used in personnel selection and appraisal. They are also used for research on and evaluation of personnel and organizational management and staffing methods, including workforce effectiveness studies. While both the USA Hire and PF2 systems perform essentially the same functions, PF2 offers technology improvements that position OPM to better serve applicants and hiring agencies. In particular, PF2 provides a modernized user interface that permits the completion of online assessments on mobile devices, provides



workflow technology that requires less administrative intervention, and offers enhanced system performance and reliability.

USA HireSM provides an assessment option that Federal agencies may use in combination with agency-specific staffing assessment questionnaires. The electronic systems include an online assessment platform used to deliver assessments for use in Federal hiring. The online assessments are designed to measure critical general competencies required for the job. They combine several multiple choice and simulation-based test types that can be delivered in an online, non-proctored setting. This permits more job specific assessments to be given to each applicant, depending on the job to which he or she is applying.

USA HireSM collects candidate information from USA Staffing® and USAJOBS. Applicants provide information to USAJOBS and USA Staffing® for use in the hiring process. For those vacancies that require an applicant to complete a USA Hire assessment, USA Staffing® sends an "order" to the USA Hire system that includes the applicant's email, first name, last name, and a unique identifier. If the required assessment is contained in the PF2 system, USA Hire sends the unique identifier to PF2 and the applicant is directed to the required assessment there. If the applicant has previously completed, within the last year, the relevant assessments, then USA Hire returns the scores to USA Staffing. If the applicant has not previously completed the required assessments, the USA Hire system sends an email invitation from OPM to each applicant that meets the minimum qualification for a particular vacancy. Applicants typically have 48 hours (typically, unless there is a reasonable accommodation adjudication) after the close of the job opportunity announcement to complete the system's assessments. The USA Hire system provides an individual applicant's scores to USA Staffing, including those generated in the PF2 system, and they are associated with the individual's application for a particular vacancy.

USA HireSM and PF2 provide a timed, multiple-choice assessment battery. There are three stages to the application process established in the USA



HireSM program: application, cognitive exams, and general exams. Both systems use animated avatars and videos to simulate challenges that could confront employees, testing their reasoning and problem-solving skills. The technology allows the tests to scale questions; a correct answer leads to a harder question and an incorrect one ratchets down to an easier option. Scoring is instantaneous, an advance that can quickly winnow the pool of applicants. USA HireSM exams are designed to assess general aptitude. But to avoid possible discrimination, the exams also measure other attributes, such as teamwork, problem solving and judgment, and are tailored to assess specific job skills. The tests were developed by personnel psychologists, who seek to ensure that all applicants are on a level field. The test results are organized into three categories: Best Qualified, Highly Qualified, and Qualified. The threshold for each category is determined by the Federal government agency that is seeking to hire employees. Unless there is a low ratio of candidates to job openings, only the best qualified are certified for the position.

The systems' assessments were designed using industry and professional best practices. Each of the more than 900 "off-the-shelf" assessment solutions are distinctively created to target specific competencies, occupations, and/or job families. They customize a measurable assessment for each job skillset if there are competencies specific to a position or to an agency. Along with the software solution, USA HireSM Solution Managers work with agencies individually throughout the selection process to mitigate issues and ensure more accuracy. These experts help agency officials determine the best solutions to meet hiring needs. Once the assessments are implemented, Solution Managers also provide ongoing support. Technical support is also offered via the USA HireSM Help Desk for any applicants who experience issues when taking the assessments. This system is compliant with Federal hiring regulations and meets Federal Information Technology (IT) security requirements.



Section 1.0. Authorities and Other Requirements

1.1. What specific legal authorities and/or agreements permit and define the collection of information by the project in question?

The U.S. Office of Personnel Management (OPM) and other Federal agencies rate applicants for Federal jobs under the authority of 5 U.S.C. §§ 1104, 1302, 3301, 3304, 3320, 3361, 3393, and 3394. 5 U.S.C. § 1104 allows OPM to authorize other Federal agencies to rate applicants for Federal jobs. Additional authorities regarding the collection of information to meet the hiring needs of Federal government agencies are contained in 5 U.S.C. §§ 3109, 3302, 3305, 3306, 3307, 309, 3313, 3317, 3318, 3319, 3326, 4103, 4702, 4723, 5532, and 5533.

1.2. What Privacy Act System of Records Notice(s) (SORN(s)) apply to the information?

The OPM/ GOVT-5 Recruiting, Examining and Placement Records and OPM/GOVT-6 Personnel Research and Test Validation Records SORNs apply to the information in USA HireSM.

1.3. Has a system security plan been completed for the information system(s) supporting the project?

Yes. Separate system security plans have been completed for both the USA Hire system and the USA Hire PF2 system in connection with their respective authorities to operate (ATO).

1.4. Does a records retention schedule approved by the National Archives and Records Administration (NARA) exist?

Yes. GRS 2.1, item 050 (DAA-GRS-2014-0002-0006), GRS 2.1, item 051 (DAA-GRS-2014-0002-0007) and GRS 2.1, item 070 (DAA-GRS-2014-00020012) are the current approved NARA schedules that apply to the information in the USA HireSM systems.



1.5. If the information is covered by the Paperwork Reduction Act (PRA), provide the OMB Control number and the agency number for the collection. If there are multiple forms, include a list in an appendix.

The information collected by the USA HireSM program is collected through OPM Form 1203-FX – Occupational Questionnaire (OMB Control Number 3206-0040) and through USA Jobs (OMB Control Number 3046-0046).

Section 2.0. Characterization of the Information

2.1. Identify the information the project collects, uses, disseminates, or maintains.

USA HireSM collects, uses, disseminates, and maintains an individual's name, email address, and a unique identifier generated by the USA Staffing system. USA Hire PF2 collects, uses, disseminates, and maintains the unique identifier. Other information maintained and used by both systems includes test content (the test questions, instructions, and format), test results and scores (the answers the user selected, calculated scores), account information for system users (username, password, role), and information related to proctored test.

2.2. What are the sources of the information and how is the information collected for the project?

Job seekers voluntarily provide their information to USAJOBS and agency talent acquisition systems (e.g., OPM's USA Staffing) as part of the application process. Where agencies use the USA HireSM program to evaluate applicant qualifications, USA Staffing sends the name email address, and unique identifier to the USA Hire system through a web interface. If the relevant assessments are contained in the PF2 system, the USA Hire system sends the individual's unique identifier to PF2; applicants provide answers to assessment questions directly into USA Hire and PF2, as applicable.



2.3. Does the project use information from commercial sources or publicly available data? If so, explain why and how this information is used.

The USA HireSM program does not obtain or use any information that is publicly available or that comes from commercial sources.

2.4. Discuss how accuracy of the data is ensured.

The initial quality of the USA HireSM program data is supported by validations at the source systems. The data collected directly from the applicant is validated for accuracy with built-in, system generated confirmations for the user's acceptance, as well as automated data confirmations of input fields. To ensure accurate transmission and translation of data, the program conducts integration testing with each system release. Some agencies and positions require an in-person monitored assessment process. To accommodate this need, OPM offers agencies access to over 600 certified testing center locations. Once assessments are completed, applicant responses and scores are securely uploaded through the USA HireSM system.

To maintain accuracy from a technical perspective, USA HireSM and PF2 capture sufficient information in audit records to establish what events occurred, the sources of the events, and the outcomes of the events. USA Hire program personnel also review and analyze application audit records for indications of inappropriate or unusual activity, investigates suspicious activity or suspected violations, reports findings to appropriate officials, and takes necessary actions.

In addition, each "order" from USA Staffing for an applicant to complete assessments in USA Hire or PF2, each application, and each individual are assigned unique identifiers so that the appropriate assessment scores are associated with the correct individual and that individual's relevant job application.



2.5. Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: There is a risk that the system will collect more information than is necessary to achieve its business objective.

Mitigation: The USA Hire program mitigates this risk by collecting information only about applicants who are identified as meeting minimum qualification and eligibility requirements for the vacancies for which they have applied and who are required to complete USA Hire assessments and only that information (name, email, address, unique identifier) that is necessary to communicate with the individual concerning the required assessments and to provide scores back to USA Staffing. Additionally, applicants are notified at the point of collection and before the assessment test if the assessments are required or optional.

Privacy Risk: There is a risk that the information in the system is not accurate and may result in individuals not being associated with the correct scores or position.

Mitigation: This risk is mitigated through validation measures, testing, and audit log monitoring, as described in Section 2.4. In addition, the use of unique identifiers associated with a particular USA Staffing orders and applications and the individuals who have applied for a particular position, are designed to accurately associate the relevant scores.

Section 3.0. Uses of the Information

3.1. Describe how and why the project uses the information.

Agencies can use the USA HireSM program's systems to automate agency assessment content, to develop new custom online assessments, or to implement the USA Hire program's standard and premium assessments. The system operates to help agencies identify the most highly qualified candidates for positions, based upon job-related competencies. The USA



HireSM uses the applicant name and email address to identify and communicate with applicants for the purpose of scheduling and delivering assessments. Both USA Hire and USA Hire PF2 use unique identifiers to store assessment scores and provide them to USA Staffing when requested.

3.2. Does the project use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly? If so, state how OPM plans to use such results.

No, the USA HireSM program does not use information it collects from the public to perform data analysis to discover a predictive pattern or anomaly.

3.3. Are there other programs or offices with assigned roles and responsibilities within the system?

OPM Personnel Research Psychologists and Vendor Staff utilize USA HireSM and USA Hire PF2 to configure applicant assessments. No other program staff within OPM use the systems. The research psychologists and the OPM vendor develop the data for research on and evaluation of personnel and organizational management and staffing methods.

3.4. Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: There is risk of PII being used outside of the scope of the initial collection, for an unauthorized purpose or by unauthorized personnel.

Mitigation: This risk is mitigated by mandatory requirements that OPM personnel and contractors with access to the system complete annual privacy training, as well as only allowing access by authorized users. Users of the USA HireSM systems are informed of appropriate uses of PII upon authorization to the system and all users are trained on the appropriate use of PII ensuring that those responsible for administering and operating the system use PII appropriately. Users are also made aware of the USA Staffing Rule of Behavior. USA Hire personnel also review and analyze application audit records for indications of inappropriate or unusual activity, investigates



suspicious activity or suspected violations, reports findings to appropriate officials, and takes necessary actions.

Section 4.0. Notice

4.1. How does the project provide individuals notice prior to the collection of information? If notice is not provided, explain why not.

The job opportunity announcement, onscreen instructions, and an invitation email all provide specific instructions on what applicants can expect and how applicants will complete next steps in the hiring process, including assessments.

Initially, job applicants are informed via the job announcement that, based on their application and responses to the application questionnaire, they may receive instructions to access the USA Hire system(s) to complete online assessments. The job announcement further explains that they will have a set amount of time (generally 48 hours) to complete the assessments, that they can request a testing accommodation under the Americans with Disabilities Act (ADA), that the results will be kept on record for use when applying for future jobs that require the same assessments, and that they will not be allowed to re-take the assessments for one year.

The USA HireSM system sends an email to those who apply for the job vacancy noting that the applicant was informed by the job announcement that they may be required to take one or more online assessments. The email provides the applicant with a link to the assessments and information regarding timing, and also provides information about how to contact the USA Hire help desk with any questions.

In addition, the fillable forms referenced in section 1.5 contain Privacy Act statements that inform the applicants why the information is being collected from them and how it will be used. Applicants to job vacancies utilizing USA HireSM and PF2 are also presented with the OPM Privacy Act statement on



both USAJOBS and USA Staffing's application manager. These statements indicate what data OPM may collect for selection assessments.

4.2. What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project?

For job vacancies that require USA Hire standard online assessments, individual applicants are informed that information will be shared with the vendor hosted USA Hire systems, that they will be required to complete assessments, and that scores will be retained and re-used for other applications for one year. Applicants may choose to not apply based on this information.

4.3. Privacy Impact Analysis: Related to Notice

Privacy Risk: There is risk that individuals will not receive appropriate notice concerning what information will be collected about them and how that information will be used.

Mitigation: This risk is mitigated through the use of Privacy Act statements on relevant forms and through providing information to individuals during the application process regarding the assessment requirement and in email communication from USA Hire when they are directed to complete the assessments. This risk is also mitigated through publication of this PIA.

Section 5.0. Data Retention by the Project

5.1. Explain how long and for what reason the information is retained.

GRS 2.1, item 050 (DAA-GRS-2014-0002-0006), GRS 2.1, item 051 (DAA-GRS-2014-0002-0007) and GRS 2.1, item 070 (DAA-GRS-2014-00020012) are the current approved NARA schedules that apply to the information in the USA HireSM program.

In accordance with the records schedules, the information in the systems is destroyed 2 year(s) after a selection certificate is closed or final settlement



of any associated litigation, whichever is later. In certain cases, where files showing the circumstances of loss, nature of the recovery action, and corrective actions when Civil Service or job-specific test questions are erroneously made potentially available to candidates, these records are destroyed 5 year(s) after date of final report.

5.2. Privacy Impact Analysis: Related to Retention

Privacy Risk: There is a risk that USA Hire information contained will be retained for longer than is necessary to meet the business needs for which it was originally collected.

Mitigation: This risk is mitigated by following the established retention schedule and documented guidance from NARA, which clearly defines retention requirements by record type.

Section 6.0. Information Sharing

6.1. Is information shared outside of OPM as part of the normal agency operations? If so, identify the organization(s) and how the information is accessed and how it is to be used.

The results of applicant assessments, in the form of numerical scores, are shared with Federal agencies who are customers of USA HireSM, but only for the agency's own job vacancies. Agencies access this information either through USA Staffing or exports of assessment results from USA HireSM for specific job vacancies. All user information provided to USA Staffing is shared with its customer Federal agencies for the referral of applicants and candidates for federal vacancies for which they have applied.

6.2. Describe how the external sharing noted in 6.1 is compatible with the SORN noted in 1.2.

The results of applicant assessments, in the form of numerical scores, are shared with Federal agencies who are customers of USA Hire, but only for the agency's own job vacancies. This is compatible with the purposes set



forth in the OPM Govt-5 SORN to use records in considering individuals who have applied for positions in the Federal service by making determinations of qualifications for positions applied for, and to rate and rank applicants applying for the same or similar positions. The records are also used to refer candidates to Federal agencies for employment consideration, including appointment, transfer, reinstatement, reassignment, or promotion. This external sharing is permitted by routine uses b, e, and r in the OPM Govt-5 SORN.

This external sharing is also consistent with the purposes set forth in the OPM Govt-6 SORN, which states that records are collected, maintained, and used by OPM or other Federal agencies for the construction, analysis, and validation of written tests and other assessment instruments used in personnel selection and appraisal, other assessment instruments used in personnel selection and appraisal, and for research on and evaluation of personnel/organizational management and staffing methods, including workforce effectiveness studies. Agencies and OPM may provide each other with data collected in support of these functions. This external sharing is permitted by routine uses a and i in the OPM Govt-6 SORN.

6.3. Does the project place limitations on re-dissemination?

USA Staffing sends applicant information to USA HireSM. Once collected, USA HireSM program data is accessed by Federal agencies through their existing USA Staffing accounts. The USA Staffing Rules of Behavior state the data will only be disclosed in connection with the performance of official duties solely for authorized purposes and data will only be disclosed to other agencies or persons expressly authorized to receive or have authorized access to it.

6.4. Describe how the project maintains a record of any disclosures outside of OPM.

Agency personnel primarily review applicant assessment results through USA Staffing. USA Staffing records and retains all user activity in the system, to



include the opening of applicant records. In addition, USA Hire and USA Hire PF2 log system activity.

6.5. Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is risk that information will be shared for a purpose other than that for which it was originally collected.

Mitigation: This risk is mitigated by only to the relevant hiring agencies and only pursuant to appropriate routine uses in the relevant SORNs.

Privacy Risk: There is a risk that information that is appropriately shared with third parties will be misused by the recipient or further disseminated without regard to its appropriate use.

Mitigation: This risk is mitigated by requiring all participating agencies to enter into Memoranda of Understanding and Interconnection Security Agreements that outline appropriate use and dissemination of USA Hire information.

Section 7.0. Redress

7.1. What are the procedures that allow individuals to access their information?

Applicants may review all information on their applications through their USAJOBS account, as USA Staffing updates USAJOBS on application status throughout the hiring process; these updates reflect the results of USA HireSM assessments. Applicants may also request their assessment scores by contacting OPM USA Hire help desk or the hiring agency. Generally, applicants are not permitted direct access back into USA Hire once they have completed the required assessments.

In addition, individuals wishing to request access to their records should contact OPM or the agency where the job application was made or



examination was taken. Individuals must provide the following information for their records to be located and identified:

- Name.
- Date of birth.
- Social security number.
- Identification number (if known).
- Approximate date of record.
- Title of examination or announcement with which concerned.
- Geographic area in which consideration was requested.

Individuals requesting access must also comply with the OPM's Privacy Act regulations on verification of identity and access to records (5 CFR part 297).

7.2. What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?

Applicants may update their information through USAJOBS and USA Staffing. Relevant to USA Hire, this enables the applicant to ensure that a current email address is available and that their name is correct. Applicants may also contact the USA Staffing or USA Hire help desks to address inaccuracies in their data. Applicants with concerns about the accuracy of their test results, or the technical performance of their testing session, may contact the USA Hire help desk. An individual may contact the agency or the Office where the application was filed at any time to update qualifications, education, experience, or other data maintained in the system. Changes will be made to the information in USA Staffing, and then updates will be made in USA HireSM with an automated process. In addition, individuals wishing to request amendment of other records under the provisions of the Privacy Act should contact the agency or OPM where the application was made or the examination was taken. Individuals must provide the following information for their records to be located and identified:

- Name.



- Date of birth.
- Social security number.
- Identification number (if known).
- Approximate date of record.
- Title of examination or announcement with which concerned.
- Geographic area in which consideration was requested.

Individuals requesting amendment must also comply with the OPM's Privacy Act regulations on verification of identity and amendment of records (5 CFR part 297).

7.3. How does the project notify individuals about the procedures for correcting their information?

The USA Hire system correspondence with applicants includes contact information for the USA Hire help desk, an online help desk with personnel available to that instruct applicants on how to obtain assistance. Job vacancies also contain information on whom to contact concerning their applications and examination. Applicants are also provided with names of Program Office representative or their respective agency HRM personnel contact information to obtain assistance. This PIA and the SORNS listed in Section 1.2 also provide notification of procedures.

7.4. Privacy Impact Analysis: Related to Redress

Privacy Risk: There is a risk that individuals will not know how to access and update their information.

Mitigation: This risk is reasonably mitigated by providing notice of redress procedures in the SORNS listed in Section 1.2, this PIA, and the USA Hire program interfaces. An individual may contact the agency or the Office where the application was filed at any time to update qualifications, education, experience, or other data maintained in the system. For example, applicants are provided with names of a Program Office representative or their respective agency's HRM personnel contact



information to obtain assistance to view and correct information, if necessary.

In addition, individuals have direct access to their information online and may update their personal information through USAJOBS and USA Staffing at any time during the application process to ensure all data is accurate, relevant, and up-to-date. Applicants may contact the USA Hire help desk to address concerns about their personal information or assessment results. USA HireSM vendor staff may also correct errors, should any be found.

Section 8.0. Auditing and Accountability

8.1. How does the project ensure that the information is used in accordance with stated practices in the PIA?

Role-based access controls are employed to limit access to the information and administration of USA HireSM and USA Staffing based on the need to know the information for the performance of official duties. USA Hire also enforces separation of duties, to prevent unauthorized disclosure and to prevent unauthorized modification of information. Strict adherence to access control, records management and privacy policies is routinely enforced by the system. In addition, all customer agencies are bound by MOUs and ISAs that document the appropriate access, use, and dissemination of the information.

8.2. Describe what privacy training is provided to users either generally or specifically relevant to the project.

Only OPM personnel research psychologists and USA HireSM vendor personnel have direct access to the USA HireSM system. All of these personnel are required to take the annual IT security and privacy awareness training.



8.3. What procedures are in place to determine which users may access the information and how does the project determine who has access?

Agencies establish user accounts for HR personnel in USA Staffing. The customer organization is prohibited from assigning rights or delegating access to the system to persons not authorized and assumes all responsibility for the licensed users it provides access. Federal IT Security requirements restrict access to USA Staffing through a dual-authentication process. Contractors are allowed to use the systems at the customer agency's discretion. Only OPM or USA HireSM vendor personnel have access to the systems to configure assessments or review applicant data.

Applicants create their initial account in USAJOBS and will receive an account in USA Staffing application manager if they apply for a Federal job.

Applicants have access to only their information in USAJOBS or the USA Staffing application manager. When a hiring agency utilizes USA HireSM for a job vacancy, USA Staffing will send information (first name, last name, email address) to USA HireSM for only qualified applicants. Applicants have access to the assessments in USA HireSM and USA Hire PF2 for only the specific vacancy for which they have applied, for an amount of time established by the hiring agency or OPM.

8.4. How does the project review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within OPM and outside?

Access to the information through USA Staffing is granted as a part of the IAA and Statement of Service agreement process entered into on an annual basis. Authorized agency personnel and the Program Manager sign a written agreement that contains the privacy and security policies for USA Staffing and the Rules of Behavior for all information types. This process is followed for organizations within OPM and outside. Where USA HireSM and USA Hire PF2 interconnect with other agency systems, the USA Hire Program Manager and responsible agency officials complete Interconnection Security Agreements that govern the behavior of agency personnel; OPM and Agency



Information System Security Officers review Interconnection Security Agreements on an annual basis.

Responsible Officials

Patrick Sharpe

USA HireSM Program Manager

Approval Signature

Signed Copy on file with Chief Privacy Officer

Kellie Cosgrove Riley

Chief Privacy Officer