Privacy Impact Assessment for

SME Resume Review Prototype (RRP)
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Abstract

The United States Digital Service (USDS) and the Office of Personnel Management are partnering to develop a new assessment strategy to engage subject matter experts (SMEs) in the qualification assessment of job applicants. (SME-Qualification Assessments). Specifically, USDS and OPM's USA Staffing program are working together to build, test, and prototype a tool for SMEs to conduct resume reviews so that USA Staffing may later build the developed functionalities into the USA Staffing system. A temporary prototype will be developed and tested in a small handful of pilots with no more than 100 total users over a six-month period. This Privacy Impact Assessment is being conducted because the prototype will collect, maintain, and use the personally identifiable information about applicants for Federal jobs.

Overview

The United States Digital Service (USDS) is partnering with the Office of Personnel Management's USA Staffing program to develop a new assessment strategy to engage subject matter experts (SMEs) in the process of determining whether applicants are qualified for positions to which they've applied. This is one phase of a larger Competitive Hiring Pilot, which aims to reduce the barriers for SME feedback as part of the hiring process. To help scale the SME qualification assessment, USDS is working with the OPM's USA Staffing program to prototype online functionality to help agencies' human resources offices partner with SMEs in the qualifications process, beginning with the resume review stage. Specifically, USDS and USA Staffing are working together to build, test, and prototype a tool for SMEs to conduct resume reviews so that, if successful, USA Staffing may later build the developed functionalities into the USA Staffing system. A temporary prototype will be developed and tested in a small handful of pilots with no more than 100 total agency users over a six-month period.

The SME Resume Review Prototype (RRP) requires up to 3 SMEs to independently review every applicant to determine whether the applicant qualifies for the position. The RRP contains the list of required competencies that each applicant must meet; each SME must record, with a yes or no response and notation from the SME regarding the reason for their response, within the tool whether the applicant meets each of the competencies. In addition, the RRP will contain the first, middle, and last name of the applicants, supplied by each participating agency's human resources staff and obtained from the USA Staffing. The SMEs review applicant resumes outside of the RRP in order to assess each competency; the resumes are not contained within the RRP.

Human resource specialists from participating agencies will review the SMEs' assessment within the tool and accept or reject the SME's review, depending on whether it is based on one of the specialized experience requirements. Human resource specialists will also be able to export the results of the SME evaluation from the tool to later upload back into USA Staffing, which will be the authoritative source.

The RRP is being built in a modern development stack and deployed to cloud.gov for development and testing. If the RRP pilots are successful in this initial six - month development and testing period, USDS and USA Staffing may offer the RRP as a service to other agencies in a second round of pilots later in FY20. During this current six-month period, USDS will continue to iterate on the features based on user feedback. USA Staffing may then decide to integrate the features of the RRP into USA Staffing if they are proven to meet user needs.

The goals in building this initial prototype SME tool are to maximize flexibility so that the USDS team can iterate quickly on the RRP in order to build, test, and learn during live agency hiring actions; have no negative impact on the current operation of the USA Staffing system and program; and minimize time to hire without compromising on quality.

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?

OPM and other Federal agencies rate applicants for Federal jobs under the authority of sections 1104, 1302, 3301, 3304, 3320, 3361, 3393, and 3394 of title 5 of the United States Code. Section 1104 of title 5 allows OPM to authorize other Federal agencies to gather information in order to rate applicants for Federal jobs. USDS received $1.7 M in Cross Agency Priority funding in FY20 to partner with OPM to help scale the two successful pilots of the SME-QA process including prototyping new online functionality to scale this work. This was approved in support of the CAP goal of Developing a Workforce for the 21st Century.

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

The applicable SORN is OPM /GOVT-5 Recruiting, Examining, and Placement Records.

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

The RRP will be hosted within OPM'scloud.gov account. Cloud.gov has FedRAMP Authorization. Cloud.gov and OPM have a Provisional Authority to Operate (P-ATO) at the Moderate impact level from the FedRAMP Joint Authorization Board (JAB).

For the RRP, OPM's OCIO and USA Staffing program will authorize an Interim Authority to Test (IATT) for six-months to conduct the initial pilots. The IATT is targeted for January 2020 and will expire on September 30, 2020.

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

The information in the RRP is covered by GRS 5.2, Item 020, Intermediary Records. The records in RRP will ultimately be uploaded into USA Staffing and subject to the applicable records schedule for that system, N1-478-11-004, item 2.

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 RRP does not engage in information collection that is subject to the PRA.

Section 2.0. Characterization of the Information

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

The RRP collects, uses, disseminates, or maintains applicants' first, middle, and last names, a unique identification number from USA Staffing, and the relevant competencies for the position to which they've applied. In addition, the RRP contains the SMEs' "yes" or "no" notations indicating the SMEs' assessment of whether the applicant has met each competency and an explanation for that assessment. The SMEs use resumes given to them outside the RRP to do their evaluation but the resumes are not contained within the tool.

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

The applicant names originate from USA Staffing. The agency's human resources staff, with assistance from USDS staff, will export the names and unique identification number directly from USA Staffing in a CSV file format and upload them into the tool using the upload functionality in the RRP; the RRP does not directly connect with or directly share information with any system. The competencies are obtained from the job announcement and are manually loaded into the RRP by either USDS or agency human resources staff.

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

No.

2.4. Discuss how accuracy of the data is ensured.

The exported file containing applicant names and USA Staffing identification numbers are uploaded into the RRP without change. The SMEs manually compare the names on the resumes they have on file with those names in the tool; the names must match up directly or the SME is instructed to consult with the human resources specialist to resolve and is unable to review a resume (this ensures that the data is accurate as the SME is using the tool). During their review, the SMEs will be prompted to confirm their assessment before moving to the next applicant so that the data is accurately reflected in the RRP. When importing the data back into USA Staffing, the applicant's USA Staffing identification number is exported from the RRP so that the SME assessments are accurately attached to applicants. All files are passed in csv format and will not be opened by any person in the process; if the files are edited, they will not properly upload into either USA Staffing or the RRP.

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

Privacy Risk: There is a risk that more information than may be necessary for the SMEs to conduct their review could be collected and maintained within the tool.

Mitigation: This risk has been mitigated by designing the tool to allow only that information that is necessary for the SME review and the prototype development

into the RRP. As such, only name, USA Staffing identification number, competency, and the SMEs yes/no assessment of whether the competency is met are collected within the RRP. The only input field is to provide a note as to why an applicant did or did not meet a competency; SMEs are trained regarding appropriate information to include and the notations will be reviewed by human resources for validity.

Privacy Risk: There is a risk that the information in the system will not be accurate, resulting in incorrect determinations regarding an applicant's qualification for a position.

Mitigation: This risk is mitigated by downloading a CSV from USA Staffing with applicant information and uploading that into the RRP without change. The RRP also provides CSV download functionality for human resource professionals to upload the results into USA Staffing without human error. The RRP will have the first, middle, and last name of each applicant to match to the batch resumes. USDS will check to see if there are two applicants with identical names before assigning the SMEs to the RRP. If this occurs, a separate identifier will be used to assist the SMEs and eliminate inaccuracies in the SME assessments.

Section 3.0. Uses of the Information

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

SMEs will use the information uploaded into the tool to record their assessments concerning the applicant and the relevant competencies. Human resources offices at participating agencies will use the results of the SME resume review to determine whether each applicant meets the technical competencies as defined during job analysis.

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.

The tool will track the percentage of applicants each SME approves or declines. The human resource specialist using the tool will be able to see if one SME is approving 100% of the applicants in their queue while another SME is approving only 10% of applicants. OPM, USDS, and the specialist will be able to use these summary percentages to determine if there is a statistical variation beyond what would be expected to improve calibration exercises and SME training in future pilots. The human resource specialist can also use this information to give individual SMEs feedback. If the specialist feels a particular SME is not filling out the checklist as

required, the specialist can clear that SME's scores and send the applicants back to the SME queue for other SMEs to assess.

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

SMEs selected by hiring managers within agencies participating in the pilots will have access to RRP. USDS and participating agencies' human resource specialists will also have access to the RRP. OPM staff will only have access in cases where they are acting as the human resource specialist or SME for a hiring action.

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

Privacy Risk: There is a risk that an unauthorized person will access the tool for an unauthorized purpose.

Mitigation: The risk of an unauthorized person accessing the tool is mitigated by building the tool in cloud.gov and using login.gov for access. USDS will manually input the email addresses of approved users who will be the only individuals who can gain entry through two-factor authentication with a login.gov account. Based on that log-in information, the RRP has an audit log that will show which of which SME made which decisions.

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.

Individuals will not have direct notice that their information will be collected and maintained in the RRP. In the relevant job announcement on USA Jobs, applicants are told that SMEs will be reviewing their resumes to determine their qualifications but are not told that their information will be included in the RRP.

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

If an individual decides to apply for a position for which SMEs will be used to review resumes, they will not have the opportunity to decline that review or to consent to the use of their information in the RRP.

When applicants sign in at USAJOBS, they are provided with and consent to the online Full Terms and Conditions of Use. Applicants who do not want to consent to the outlined uses may choose not to apply.

4.3. Privacy Impact Analysis: Related to Notice

Privacy Risk: There is a risk that applicants will not know that their information is being collected in the RRP.

Mitigation: This risk is mitigated through publication of the PIA and general notice that their resumes will be reviewed by SMEs in a pilot program in the job announcement.

Section 5.0. Data Retention by the Project

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

The information in the RRP is covered by GRS 5.2, Item 020, Intermediary Records, which requires that the records be destroyed upon verification of successful creation of the final document or file, or when no longer needed for business purposes, whichever is later. Accordingly, the SME resume review results will only be stored within RRP for 2-3 weeks before the data is exported by the human resource specialist and uploaded into USA Staffing. During that 2-3 weeks period that the information is retained, the HR specialist can review the SME's decisions, send feedback to the SME, and ensure the process is progressing. When the records in RRP are ultimately be uploaded into USA Staffing, they will be subject to the applicable records schedule for that system, N1-478-11-004, item 2.

5.2. Privacy Impact Analysis: Related to Retention

Privacy Risk: There is risk that the information in the RRP will be retained for longer than is necessary to fulfill the business need for the information

Mitigation: This risk is mitigated by adherence to the applicable records schedule. USDS will electronically delete information from the backend database after ensuring human resources staff is done with its review and download to USA Staffing.

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.

All information that an applicant provides through USA Staffing is accessible to the relevant agency users who posted the job vacancy that the applicant applied for

and who are responsible for the activities associated with filling that vacancy. For a government-wide vacancy, the applicant will be told in the announcement that multiple agencies will be assessing and qualifying the applicants jointly and then the agencies will share the certificate for selections.

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

The information contained in the RRP and accessed by staff from the agencies participating in the pilots is used and disclosed consistent with the purpose articulated in the OPM Gov't 5 SORN, which states that "the records are used in considering individuals who have applied for positions in the Federal service by making determinations of qualifications . . . .They are also used to refer candidates to Federal agencies for employment consideration. . . . ."

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

All agencies participating in the pilots are governed in their handling of the records in the RRP by the OPM Gov't 5 SORN. In addition, agency users are subject to the Rules of Behavior that outline appropriate handling and use of USA Staffing information.

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

The RRP has an audit log of which SME made which decision which will be uploaded into USA Staffing.

6.5. Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk that a SME will share the information in the RRP with a person or entity that does not have a need-to-know.

Mitigation: This risk is mitigated by only providing access to those SMEs that are whitelisted to use the RRP and who have signed confidentiality agreements and completed a 3-hour resume review training before gaining access to the reviews.

Section 7.0. Redress

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

Individuals do not have access to the RRP and cannot directly access information about themselves that is contained in the tool, but all decisions are stored in USA Staffing as part of the job posting. All notes by SME's and any competencies not

met are uploaded to USA Staffing. Once applicants have created a username and password and sign in through USAJOBS, they can access their information in USA Staffing. In addition, the OPM Gov't 5 SORN provides instructions to those individuals who wish to access non-exempt information. Such individuals should contact the agency to which they applied for a position and provide the following information: name, date of birth, SSN, id number (if known), approximate date of records, title of announcement, and the geographic area of consideration.

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

Individuals do not have access to the RRP and cannot directly correct any inaccurate information about themselves that is contained in the tool. More generally, applicants are able to update their profile information online via USAJOBS and those corrections are inherited by USA Staffing. In addition, applicants may contact the agency representative identified in a job vacancy and request changes to their information once the announcement has closed. The USA Staffing Help Desk also responds to applicant requests related to erroneous or inaccurate information and refers those applicants to the appropriate agency representative. In addition, the OPM Gov't 5 SORN provides instructions to those individuals who wish to access non-exempt information. Such individuals should contact the agency to which they applied for a position and provide the following information: name, date of birth, SSN, id number (if known), approximate date of records, title of announcement, and the geographic area of consideration.

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

USA Staffing has an online help tools that instruct applicants on how to obtain assistance, as well as help desks that can assist applicants who have questions concerning access to and correction of their information. In addition, the job announcements list an HR point of contact for applicants to contact to correct any information necessary.

7.4. Privacy Impact Analysis: Related to Redress

Privacy Risk: There is a risk that individuals will not be able to amend incorrect or incomplete information, impacting the SME assessment and ultimate hiring decision.

Mitigation: This risk is not directly mitigated within the RRP but is mitigated by providing individuals with appropriate access to USA Jobs and USA Staffing to

review and correct information and by providing information concerning how to generally correct their information through publication of the relevant SORN and this PIA.

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?

USDS captures sufficient information in audit records to establish what events occurred, the sources of the events, and the outcomes of the events. These records are reviewed by staff on the USDS pilot team for indications of inappropriate or unusual activity. As necessary, USDS and the relevant human resource specialist may then investigate suspicious activity or suspected violations, report findings to appropriate officials, and take necessary actions.

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

The USDS pilot team works with the human resource specialists assigned to each pilot to provide resume review training to all SMEs and human resource staff and remind SMEs that the proficiency levels are confidential testing material. In addition, all agency employees are required to take annual 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?

The tool will be used for a limited number (likely 1-4) of hiring pilots over a six-month period with likely only 3-15 SMEs for each pilot. USDS will whitelist the names of each SME and help them establish login.gov accounts during the resume review training. Only the SMEs approved for each pilot, who have signed confidentiality agreements and have completed the SME resume review training, will have access to this RRP.

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?

There are not currently any new information sharing agreements, new uses of the

information in the RRP, or new access to the information contemplated. To the extent that changes in the course of the pilots, the relevant stakeholders at OPM, USDS, and the participating agencies will evaluate and approve where appropriate.

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