



## **Privacy Impact Assessment of PeopleClick Recruitment Management System**

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

PeopleClick Recruiting Management System (PeopleClick RMS)

### **System Owner:**

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

### **Contact information:**

System Owner: Karen Vassallo, Associate Director  
Organization: Management Division  
Address: 20<sup>th</sup> Street and Constitution Avenue, N.W.  
Washington, DC 20551  
Telephone: (202) 452-2460

IT System Manager: Jack Martin, Information Systems Specialist  
Organization: Management Division  
Address: 20<sup>th</sup> Street and Constitution Avenue, N.W.  
Washington, DC 20551  
Telephone: (202) 280-9962

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

PeopleClick RMS is used by Board staff to track and screen job applicants for positions within the Board.

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

PeopleClick RMS collects and maintains the following personal information related to external job applicants:

- a. Name;
- b. Home address;
- c. Personal telephone numbers;
- d. Personal email address;
- e. Education and work history;
- f. Race (optional);
- g. Gender (optional); and
- h. U.S. employment eligibility (citizenship or green card status).

Finally, if an applicant is offered a position, PeopleClick RMS collects the salary, pay-grade, and title offered.

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

The personal information collected and maintained in PeopleClick RMS is provided by the job applicant or a recruiter through an online form.

**3. Purposes for which the information is being collected.**

The personal information collected and maintained in PeopleClick RMS is used to assist Board staff in tracking and screening job applicants for positions within the Board. A job applicant's race and gender information is used to prepare statistical reports to the Board's Equal Employment Opportunity Office and to Congress pursuant to section 342 of the Dodd-Frank Act, 12 U.S.C. § 5452. The Board's Human Resources function also uses the system to produce applicant reports such as source of candidates and status of filling requisitions.

**4. Who will have access to the information.**

Access to the personal information maintained in PeopleClick RMS is limited to authorized employees and contractors within the Board who have a need for the information for official business purposes. In addition, all information in the system may be disclosed for enforcement, statutory, and

regulatory purposes; to another agency or a Federal Reserve Bank; to a member of Congress; to the Department of Justice, a court, an adjudicative body or administrative tribunal, or a party in litigation; to Federal, state, local and professional licensing boards; to the EEOC, the Merit Systems Protection Board, the Office of Government Ethics, and the Office of Special Counsel, to contractors, agents, and others; to labor relations panels; and where security or confidentiality has been compromised. Records may also be used to disclose information to any source from which additional information is requested (to the extent necessary to identify the individual, inform the source of the purpose(s) of the request, and to identify the type of information requested), when necessary to obtain information relevant to a Board decision to hire or retain an employee, issue a security clearance, conduct a security or suitability investigation of an individual, classify jobs, let a contract, or issue a license, grant, or other benefits.

**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 submit job applications into PeopleClick RMS; however, that failure will result in the Board's inability to consider them for job vacancies.

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

The job applicant posting for a career opportunity is responsible for the accuracy, completeness, and timeliness of the information submitted during the application process. Board staff does have the capability to update information if they become aware that a job applicant's information changes, for example, a change in address is determined to be incorrect.

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

PeopleClick RMS records used by Board staff to track and screen job applicants for positions within the Board are covered by General Records Schedule 1, Item 33. n. which provides that the records shall be maintained for two years. Paper records designated for destruction will be shredded.

Electronic records that are destroyed will be purged in accordance with established procedures.

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

Access to PeopleClick RMS is restricted to authorized employees and contractors within the Board who require access for official business purposes. Board 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. Periodic audits and reviews are conducted to determine whether authenticated users still require access and whether there have been any unauthorized changes in any information maintained in PeopleClick RMS.

**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.)**

PeopleClick RMS is covered by an existing Privacy Act system of records notice, BGFRS-1, FRB - Recruiting and Placement Records.

**Reviewed:**

Charles Struckmeyer */signed/*

02/14/2011

\_\_\_\_\_  
Chief Privacy Officer

\_\_\_\_\_  
Date

Maureen Hannan */signed/*

03/11/2011

\_\_\_\_\_  
Chief Information Officer

\_\_\_\_\_  
Date