



Privacy Impact Assessment Update
for

eRecruitment

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Abstract

The Department of Homeland Security (DHS), Office of the Chief Human Capital Officer (OCHCO), has implemented an enterprise recruiting system, called eRecruitment. OCHCO conducted a privacy impact assessment (PIA) with the original system deployment because eRecruitment uses and maintains personally identifiable information. The purpose for this update is to expand the scope of the data being addressed within eRecruitment.

Introduction

The Department of Homeland Security (DHS), Office of the Chief Human Capital Officer (OCHCO) utilizes the eRecruitment system as an automated recruitment solution to meet the mission critical needs of DHS and comply with the 45-day hiring model under the President's Management Agenda. It is a talent recruiting and acquisition solution that supports both internal and external evaluation, selection, and hiring/placement of applicants. eRecruitment provides clients with the ability to track sensitive Equal Employment Opportunity (EEO)-based information such as race and national origin (RNO), gender, disability and targeted disability. Because of the sensitivity of this information, the design of the application allows for unique security options for these fields to control who has access to the information and to ensure that visibility is restricted to need to know.

The original deployment of eRecruitment did not collect this information due to pending DHS policy and legal issues regarding collection of these data attributes. Civil Rights and Civil Liberties (CRCL) and DHS Human Resource (HR) Policy have subsequently resolved these issues and have approved this functionality.¹

Reason for the PIA Update

The purpose of this PIA update is to enable the online capture of RNO, gender, disability, and targeted disability for analyzing application and hiring trends to support EEO and Office of Personnel Management (OPM) guidelines mandating this analysis. Specifically, federal agencies are required to collect RNO² and disability information from federal new hires/employees, and OPM requires that agencies report such information annually using the MD-715 (an EEO standard compliance report).

With this update, eRecruitment can now systematically prompt applicants for submission of their data. The prompt for this information allows each applicant to submit an option of full opt out or field-specific opt out of this information, should they have any concern. This PIA update pertains specifically to collecting Ethnicity Race Indicator (ERI)/disability information on applicants for federal positions.

DHS collects ERI pursuant to 42 U.S.C. Section 2000e-16 and in compliance with OMB's 1997 Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity. Providing this information is voluntary and has no impact on employment status. DHS uses ERI to plan for equal employment

¹ SF 181 Ethnicity and Race Identification (http://www.opm.gov/forms/pdf_fill/sf181.pdf) and SF 256 Self-Identification of Handicap (<http://www.opm.gov/forms/pdfimage/sf256.pdf>)

² For DHS purposes, RNO is commonly referred to as the Ethnicity Race Indicator (ERI).



opportunities throughout the Department as well as to develop workforce-related statistics and analytical studies.

DHS collects disability-related information pursuant to the Rehabilitation Act of 1973 (P.L. 93-112). DHS uses this information to produce statistical reports to show progress in hiring, placement, and advancement of handicapped individuals and to locate employees for voluntary participation in surveys.

Privacy Impact Analysis

In each of the below sections consider how the system has changed and what impact it has on the below fair information principles. In some cases there may be no changes and indicate as such.

The System and the Information Collected and Stored within the System

eRecruitment is adding four optional fields to the Career Section of the Candidate user interface. The four fields are: race and national origin, gender, disability, and targeted disability. The Career section provides information to be collected in a 6-step process, under the “Additional Information” page. Within eRecruitment, each candidate will be presented with the option to provide this information electronically in lieu of paper submission.

The purpose of this information is to provide summary analysis of applicant information to ensure that vacancies are not being sourced in such a way as to present EEO issues for fair and open employment. Providing this information is voluntary and will not impact an individual’s eligibility for employment.

Collection of the identified data is required by OPM for all new government hires. Further, the government has authorized agencies to collect this information on applicants for EEO analysis. Risk of individual information exposure is mitigated by system security limiting access only to candidates and presenting this information in aggregate or summary version for reporting. System administrators have been fully trained on DHS Security policies for protection of PII and sensitive PII.

Uses of the System and the Information

No change.

Retention

No change.

Internal Sharing and Disclosure

No change.

External Sharing and Disclosure

No change.



Notice

No change. This collection is covered by OPM/GOVT-7, Applicant Race, Sex, National Origin, and Disability Status Records, 71 FR 35341 (June 19, 2006).

Individual Access, Redress, and Correction

No change.

Technical Access and Security

The privacy risks of a manager or HR professional being able to view sensitive EEO data are mitigated by proper implementation of security and access restrictions. Only eRecruitment system administrators will have direct access to applicant EEO data, for the purpose of troubleshooting system problems. The hiring manager and staffing specialists are restricted from viewing this information during the hiring or staffing process to preclude the potential of discriminatory hiring practices. In the Analytics and Reporting environment, the EEO data is not reportable at the candidate level, but rather summarized only for the purpose of creating summary analysis data of applicants populations by breakdown (gender, disability, and race) to determine EEO trends. For example, EEO may see that x males vs. y females are applying for vacancies.



Technology

eRecruitment is web-based architecture. It is based on a Software as a Service product that has been configured to meet specific DHS requirements. The system operates on the UNIX/JAVA platform and uses Oracle as the database technology. The change requirement to collect RNO information does not introduce any additional privacy risks. The hardware supporting eRecruitment is physically located at a DHS-approved Application Hosting Provider (InterNap Data Center) located in New York City.

The information is a configuration change only and does not require code modification. Within eRecruitment, changes to the systems configuration of the nature, do not require physical code change. Rather, through configuration capabilities, fields, screens, security, and other attributes are enabled via settings within the administration module of system. The system deploys role-based security that only allows system administrators and candidates to view the data. eRecruitment has undergone a review of its security controls and meets the Certification and Accreditation criteria required of a system hosting privacy data.

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Original signed version on file with the Privacy Office

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