



Privacy Impact Assessment for
**SME Assessment Review Prototype
(ARP)**

October 28, 2020

Updates and Replaces SME Resume Review Prototype PIA, February 10, 2020

Contact Points

Kelvin Luu
Digital Service Expert
US Digital Service

Dianna Saxman
Deputy Associate Director, Human Resource Solutions

Reviewing Official

Kellie Cosgrove Riley
Chief Privacy Officer



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 and applicant assessments so that USA Staffing may later build the developed functionalities into the USA Staffing system. A temporary prototype in which the SMEs evaluated resumes only was developed and tested in a small handful of pilots with no more than 100 total users over a six-month period. A Privacy Impact Assessment was conducted because the prototype collected, maintained, and used the personally identifiable information about applicants for Federal jobs. That pilot was successful, and this Privacy Impact Assessment is being updated and republished to reflect the expansion of the project to include the SMEs evaluation of assessments, in addition to their resume review, as USDS and OPM continue piloting the existing prototype over the next twelve months.

Overview

The United States Digital Service (USDS) is partnering with the Office of Personnel Management's (OPM) 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 effort also supports the Executive Order on Modernizing and Reforming the Assessment and Hiring of Federal Job Candidates, issued on June 26, 2020. 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 OPM's USA Staffing program to prototype online functionality to help agencies' human resources offices partner with SMEs in the qualifications process. The



initial pilot activity involved SMEs reviewing only resumes and recording their review in the tool. That pilot was successful and USDS and USA Staffing are now expanding the use of the project to include the SMEs evaluation of assessments, in addition to their resume review. They will continue piloting the existing prototype over the next twelve months to assess the expansion beyond resume review. Specifically, USDS and USA Staffing are working together to build, test, and prototype a tool for SMEs to support the hiring process by reviewing resumes and providing assessment ratings. The temporary prototype will continue to be developed and tested in a small handful of hiring actions within the expanded pilot with no more than 100 total agency users over a twelve-month period.

The SME Assessment Review Prototype (ARP) requires up to 3 SMEs to independently review every applicant to determine whether the applicant meets, does not meet, or exceeds the required competencies for each assessment. An assessment can include things such as resume review, writing samples, work samples, structured interviews, other assessments, or a combination of these. The result of these assessments will be used to determine if an applicant is qualified for a position. The ARP contains the list of required competencies and proficiencies that each applicant must meet; each SME must record a notation in the tool with their reasoning for whether an applicant did not meet, met, or exceeded each competency and proficiency. The standards for whether an applicant meets, does not meet, or exceeds a competency will be determined during job analysis workshops prior to the job announcement. In addition, the ARP will contain the first, middle, and last name of the applicants, supplied by each participating agency's human resources staff and obtained from USA Staffing. The SMEs review applicant resumes and conduct additional assessments outside of the ARP in order to assess each competency; the resumes and assessment materials are not contained within the ARP. The resumes and other assessment will be made available to SMEs involved in the process by the human resource specialists overseeing the process - examples of this could be by access to USA Staffing; access to applicant resumes by email; or



access to other assessment tools used by each agency. The tool only stores the score information entered by the SMEs and indicating the applicant's level of competency and proficiency regarding each of the criteria and any SME generated notes providing details (if applicable) behind the score.

Human resource specialists from participating agencies will review the SMEs' assessment ratings within the tool. Human resource specialists will also be able to export the results of the SME evaluation from the tool to later upload into USA Staffing, which will be the authoritative source.

The ARP is being built in a modern development stack and deployed to cloud.gov for development and testing. The initial ARP pilot projects have been successful during their first six month development and testing period, therefore USDS and USA Staffing are now seeking to offer the ARP as a service to other agencies in a second round of pilots in FY20 and into FY21; this will be happening as USA Staffing begins to build the ARP functionality into their existing application. During this twelve-month period, USDS will continue to iterate on the features based on user feedback. USA Staffing and USDS are currently partnering on a task order to integrate the features of the ARP into USA Staffing because the initial pilot features have proven to meet user needs.

The goals in extending this prototype SME tool are to maximize flexibility so that the USDS team can iterate quickly on the ARP 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. In addition to this, the tool supports the execution of the June 26th, 2020, Executive Order on Modernizing and Reforming the Assessment and Hiring of Federal Job Candidates.

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 ARP is hosted within OPM's cloud.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).

OPM's OCIO and USA Staffing program are preparing an Interim Authority to Test (IATT) to conduct the pilots.

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

The information in the ARP is covered by GRS 5.2, Item 020, Intermediary Records. The records in ARP 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 ARP 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 ARP collects, uses, disseminates, or maintains applicants' first, middle, and lastnames, a unique identification number from USA Staffing, and the relevant competencies for the position to which they've applied. In addition, the ARP contains the SMEs' "does not meet", "meets", or "exceeds" notations, indicating the SMEs' assessment of whether the applicant has met each competency and an explanation for that assessment. The SMEs use assessment materials (such as resumes, portfolios, written assessments) provided to them outside the ARP to do their evaluation; however, the assessment materials 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 ARP; the ARP 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 ARP by either USDS or agency human resources staff. The assessment materials are shared with SMEs by the agency's



human resource staff by granting limited access to USAS or other platforms, via email, or by the current process used by the agency to share applicant information.

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

There is a potential for assessment material to come from a commercial source if the partner agency is using a procured commercial software as part of their assessment. However, that material is reviewed by the SMEs outside of the tool and not contained within the tool.

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 ARP without change. The SMEs manually compare the names on the assessment materials 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 flag the applicant for later review. 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 ARP. When importing the data back into USA Staffing, the applicant's USA Staffing identification number is exported from the ARP so that the SME assessments are accurately attached to applicants. All files are passed in CSV file 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 ARP.

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 ARP. As such, only name, USA Staffing identification number, competency, and the SMEs does not meet/meets/exceeds assessment and notes of whether the competency is collected within the ARP. The only input field is to provide a note as to why an applicant did or did not meet a competency/proficiency; 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 ARP without change. The ARP also provides CSV download functionality for human resource professionals to upload the results into USA Staffing without human error. The ARP will have the first, middle, and last name of each applicant to match with the resumes and assessment materials. USDS will check to see if there are two applicants with identical names before assigning the SMEs to the ARP. 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 and corresponding level of proficiency. Human resources offices at participating agencies will use the results of the SME 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, for example, 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 human resources 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 ARP. USDS and participating agencies' human resource specialists will also have access to the ARP. 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 ARP 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 ARP. In the relevant job announcement on USA Jobs, however, applicants are informed that SMEs will be reviewing their assessment materials throughout the process to determine their qualifications.

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 and assessment materials, they will not have the opportunity to decline that review or to consent to the use of their information in the ARP. 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 ARP.

Mitigation: This risk is mitigated through publication of the PIA and general notice that their resumes and assessment materials 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 ARP 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 and assessment results will only be stored within ARP for 6-8 weeks before the data is exported by the human resource specialist and uploaded into USA Staffing. During that 6-8 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 ARP are ultimately 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 ARP 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 has completed its review and downloaded the results 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. Only the relevant agency SMEs and HR specialists will have direct access to the information in the tool.



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 ARP 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 ARP 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 ARP has an audit log detailing 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 ARP 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 ARP and who have signed confidentiality agreements and completed a 3-hour resume review training and/or an assessment 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 direct access to the ARP 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 the results of the SMEs' assessments of competencies and proficiencies 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 and will be able to access the final determination. 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 direct access to the ARP 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 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 ARP 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 and/or assessment training to all SMEs and human resource staff and remind SMEs that the proficiency levels are confidential testing material. For example, if a SME is participating in resume review, then they are required to attend the resume review training; if participating in written assessment review then they will attend an assessment training. 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 twelve-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 and/or assessment training. Only the SMEs approved for each pilot, who have signed confidentiality agreements and have completed the corresponding SME training, will have access to this ARP.

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 ARP, 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.



Responsible Officials

David Nesting
Deputy Chief Information Officer
Office of Personnel Management

Dianna Saxman
Deputy Associate Director
Human Resource Solutions
Office of Personnel Management

Kelvin Luu
Digital Service Expert
US Digital Service

Approval Signature

Signed Copy on file with the Chief Privacy Officer

Kellie Cosgrove Riley
Chief Privacy Officer