



Privacy Impact Assessment for
USA Hire - HireVue

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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. OPM uses the electronic program named USA Hire to allow federal government job applicants to complete required online assessments which are used as criteria to determine their qualifications for positions for which they have applied. USA Hire, in partnership with the United States Digital Services, is piloting the use of HireVue, an electronic tool to conduct interviews of applicants for Federal employment, in order to evaluate candidates for a limited number of vacancies. HireVue permits Federal agencies to conduct interviews virtually while ensuring standard processes that are fair to all applicants. This Privacy Impact Assessment is being conducted because HireVue tool will collect, use, and maintain information about individual applicants for Federal employment.

Overview

The USA Hire Group in the Federal Staffing Center, in the Human Resource Solutions Division (HRS) of the Office of Personnel Management (OPM), operates the USA Hire Program. OPM uses the electronic program named USA Hire to allow federal government job applicants to complete required online assessments which are used as criteria to determine their qualifications for positions for which they have applied. The United States Digital Service (USDS) is partnering with OPM's USA Staffing program, also located in OPM's Federal Staffing Center in HRS, and the USA Hire Group to develop and test 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. As part of this strategy, USDS worked 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. The piloting of the Resume Review Prototype (RRP) is underway and is the



subject of a separate PIA. Once SMEs have used the RRP to evaluate whether applicants are qualified for a position they need to conduct interviews of the candidates.

HireVue, a large enterprise software platform, provides on-line interviewing capability and is set up to allow for SMEs to easily engage in the hiring process through live, but virtual, or pre-recorded structured interviews. The OPM implementation of this platform is named USA Hire-HireVue. The use of USA Hire-HireVue to schedule and conduct interviews is being piloted with the USA Hire Group in the context of the broader SME assessment project. USDS has an agreement with the USA Hire Group under the provisions of the Revolving Fund, 5 U.S.C. §1304 (e)(1), which permits OPM to perform human resources management services for Federal agencies on a reimbursable basis, which allows USDS to test UAS Hire - HireVue as well.

Each federal hiring action in which the RRP tool is being used has an HR Specialist assigned to it who will be able to send a link for applicants to sign up in USA Hire-HireVue using their first name, last name, and email address or can upload that information directly into USA Hire-HireVue and applicants will receive individual links to take their interview without needing to sign up. Then USA Hire-HireVue sends a link that is individualized to each candidate so each person can access their interview page and conduct their interview at a convenient time for them within a certain timebox period. If it's a live interview, the scheduling is facilitated by SMEs entering their availability into USA Hire-HireVue so there can be a connection between the applicants and SMEs. Once scheduled, applicants will complete either live or recorded interviews.

A USA Hire-HireVue synchronous interview uses audio to connect recruiters, hiring managers, subject matter experts, and candidates in real-time. A USA Hire-HireVue asynchronous interview lets candidates record responses to structured, consistent, job-relevant questions that are preloaded into the USA Hire-HireVue platform without the presence of a recruiter, hiring manager, or SME. Asynchronous interviews are always recorded to be accessed



later. Agencies can choose to record synchronous interviews for the case file. Synchronous and asynchronous interviews can be shared among the hiring team, and members of the team can log into USA Hire-HireVue to listen to the interview. In this pilot, SMEs will review applicant responses to the structured interview questions and determine whether they meet established qualification requirements. USA Hire-HireVue allows for collecting feedback within their platform but SMEs can also record their feedback in Word document templates which can be reviewed by the assigned federal HR Specialist and then uploaded into USA Staffing for the announcement's case file.

USA Hire-HireVue collects the first, middle, last name, and email address of participating SMEs and applicants. USA Hire-HireVue is able to capture the voice and likeness of applicants in recorded interviews, however, for the pilots testing of asynchronous interviews the video feature will be disabled for both SMEs and applicants and only audio will be made available to applicants and SME reviewers. For synchronous interviews, while the video cannot be disabled, applicants and SMEs will be given instructions on how to turn off their cameras in advance of the interview.

The USA Hire Group will use the results from these pilots to determine whether to roll this out more broadly to other customers seeking this same functionality. During the pilot USDS and USA Hire will evaluate the applicant experience to see if qualified applicants dropped out of the process because interviews were less personal when using the asynchronous feature. USDS and USA Hire-HireVue will also evaluate the ease of the tool for SME reviewers and the impact on the overall impact of the tool on time to hire compared with pilots that relied solely on synchronous phone interviews and to determine whether there are privacy considerations that require additional scrutiny.



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.

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 Hire-HireVue.

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

OPM has issued an Interim Authority to Test, effective May 11, 2020, that is valid for 90 days.

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

Interview records are covered by GRS 2.1, Item 090.

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 answers to the structured interview questions in HireVue are not subject to the PRA. The applicant's name and email address, which are entered into the HireVue tool, are not collected directly from the original applicant but may be collected originally through OPM Form 1203-FX – Occupational Questionnaire (OMB Control Number 3206-0040) and through USAJOBS (OMB Control Number 3206-0046).



Section 2.0. Characterization of the Information

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

USA Hire-HireVue will collect the following information about applicants: First Name, Last Name, Email Address, and Likeness (Voice Recording), responses to structured interview questions, and, in some instances, the SMEs evaluation regarding whether an applicant meets the required competencies based on answers to the structured interview questions.

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

In this initial pilot use of USA Hire-HireVue, an agency's HR Specialist will enter the applicant's first name, last name, and email address into the USA Hire-HireVue tool and the applicant will be invited by email to complete an interview using the USA Hire-HireVue tool. Applicants alternatively may receive a link from their USA Staffing notification letter to sign up directly in USA Hire-HireVue using their email address to complete their asynchronous interview or to schedule a synchronous interview. For asynchronous interviews, the structured interview questions are loaded into USA Hire-HireVue in advance and applicants have multiple tries to record their responses. For synchronous interviews, applicants will verbally respond to previously determined structured interview questions.

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 applicant's name and email address are obtained from USA JOBS and USA Staffing where they are provided by the applicant and accuracy is addressed in those systems. The HR Specialists enter this information into USA Hire-Hire Vue by uploading it through an excel document they



downloaded from USA Staffing. They can also choose to have applicants enter their own information, which will be linked to their USA Staffing information through the applicant's email address. In this case, the HR Specialist will tell the applicants to use the same email address they used to apply to the position. The answers to interview questions come directly from the applicants and are, therefore, presumed to be accurate. They are linked to the applicant via email address so that the recorded interviews are accurately associated with the correct applicant.

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 because the USA Hire-HireVue tool only accepts name and email address in order to notify the applicants about their interview. In addition, the information recorded in the tool by the applicant is limited to answers to structured interview questions designed to elicit specific information. Additionally, applicants will be given instructions to only provide responses to the questions and not to include any sensitive personal information.

Section 3.0. Uses of the Information

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

SMEs will use applicants' responses to the interview questions to determine whether applicants meet or exceed the minimum qualifications for a Federal job; or the level of proficiency a qualified applicant demonstrates in competencies that have been established as critical to successful job performance.



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.

USA Hire-HireVue does not use technology to discover or locate a predictive pattern or anomaly.

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

SMEs of Federal agencies that choose to use USA Hire-HireVue will have access to applicant interviews for the purposes of evaluating qualifications or proficiency in identified competencies. Federal agency HR Specialists will have access to USA Hire-HireVue to enter applicant names and email addresses and to coordinate the scheduling of interviews. USDS, and USA Hire working with the HR Specialist will have access to USA Hire-HireVue to enter interview questions and to configure the platform's settings such as creating video welcome messages to applicants and turning off unnecessary HireVue features.

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 or that an authorized person will access information for an unauthorized purpose.

Mitigation: The risk of an unauthorized person accessing the tool is mitigated by permissions and sign on requirements within the USAHire-HireVue platform already in place. The HR Specialist is the administrator and has permission to give accounts to the necessary personnel such as SMEs and auditors. These individuals create USAHire-HireVue accounts but can only gain access once the HR Specialist grants their email permission to the material.



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.

In this initial piloting of USA Hire-HireVue, the job announcement informs candidates that they will have up to two qualifying structured interviews. When they are notified that they passed the resume review portion of the process, they will be told to expect an email from USA Hire-HireVue with the link to do their interview over a certain time period. The letter will explain the HireVue process to them. In addition, when they log into USA Hire-HireVue, they land on a welcome page that will provide information, including a Privacy Act statement, concerning what information is being collected from them and how it will be used. They are informed there and in the email notification that video recording has been disabled (for asynchronous interviews) or are provided with instructions for disabling video (for synchronous interviews). Applicants will be provided with this information before they begin their interview.

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

In this initial pilot, applicants may choose to not engage in the interview using USA Hire-HireVue but in doing so are declining to continue in the application process and will not be considered for the position. However, applicants will be told if they need an accommodation or have a laptop without a microphone then they can have an alternative phone interview using the same structured interview questions.

4.3. Privacy Impact Analysis: Related to Notice

Privacy Risk: There is risk that individuals will not receive appropriate notice concerning the use of USA Hire-HireVue and what information will be collected about them and how that information will be used.

Mitigation: This risk is mitigated through the USA Staffing notification letter telling explaining the use of USA Hire-HireVue to applicants, and on the



welcome page once the applicant accesses USA Hire-HireVue and where they will be provided with a Privacy Act statement. 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.

In accordance with the records schedule identified in Section 1.4, the information in USAHire-HireVue is destroyed 2 year(s) after a selection certificate is closed or final settlement of any associated litigation, whichever is later.

5.2. Privacy Impact Analysis: Related to Retention

Privacy Risk: There is risk that the information in USA Hire-HireVue 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. In accordance with the records schedules, the information in the system is destroyed 2 year(s) after a selection certificate is closed or final settlement of any associated litigation, whichever is later. USA Hire-HireVue has a records deletion features which they have set to adhere to federal record requirements.

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 information in USA Hire-HireVue is available outside of OPM only to those Federal agencies who are customers of USA Hire-HireVue and only for



the agency's own job vacancies or for government-wide hiring actions that are shared certificates across the government.

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

The external sharing of information outside of OPM with appropriate Federal agencies 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. 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?

The use of USA_Hire-HireVue is subject to the formal HireVue Acceptable Use policy which defines acceptable and prohibited actions by a user related to applicant information.

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

USA Hire-HireVue utilizes system logging to capture a record of access and actions related to systems and data. Audit logs, known as Evaluation



Feedback Reports, are reports that can be pulled directly from USA Hire-HireVue and can let the HR Specialist or a federal hiring auditor know who has had access to the interviews and data.

6.5. Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk that agency personnel will share the information from USA Hire-HireVue with a person or entity that does not have a need-to-know. There is also a risk that HireVue will use the information for purposes other than that which OPM intends in engaging the tool.

Mitigation: This risk is mitigated by only providing access to those SMEs that have a business need to use USA Hire-HireVue and who have been trained on the appropriate use of USA Hire-HireVue. In addition, authentication and authorization controls are in place to manage appropriate access to systems and data. Hire Vue itself, pursuant to its FedRamp certification, does not have access to the information in USA Hire-HireVue.

Section 7.0. Redress

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

In general, 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. With respect to interviews conducted in USA Hire-HireVue specifically, applicants may ask the assigned HR Specialist if they can re-watch their video and it is up to agency policy to determine if applicants should gain access to previously submitted material.

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 the record, title of examination or announcement with which concerned, and the 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?

Within USA Hire-HireVue, applicants are provided with more than one opportunity to re-record their answers to structured interview questions so that they can ensure that their responses are accurate. All applicants are able to re-do their recorded answer up to two times if not satisfied with the first response. Once completed and submitted, they can no longer re-do answers. The HireVue privacy policy outlines the steps an individual should follow to correct inaccurate or erroneous information.

More generally, applicants may contact the USA Staffing or USA Hire help desks to address inaccuracies in their data. In addition, individuals wishing to request amendment of other records under the provisions of the Privacy Act should contact the relevant agency or OPM. 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 the record, title of examination or announcement with which concerned, and the 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).

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

Notification is provided through the initial email sent to applicants to schedule their USA Hire-HireVue interview, at the USA Hire-HireVue welcome page, and through this PIA.



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 applicants with information about how to use USA Hire-HireVue in the initial email and at the welcome page and by including information about their HR Specialist if they have any questions about their correct email address to use.

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 Hire-HireVue and USA Staffing based on the need to know the information for the performance of official duties. 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 Rules of Behavior that document the appropriate access, use, and dissemination of the information.

The applicant records link to the correct recording through a match with the applicant's email address. That is the common identifier used between the USA Staffing download and the HireVue platform to ensure records stay linked.

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

All OPM and vendor personnel are required to complete annual role-based security and privacy training. In addition, all SMEs and HR Specialists will have a USA Hire-HireVue training specific to their roles prior to using the platform.



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

USA Hire-HireVue employs role based security, where personnel have access only to the data for which they have a legitimate business need. Each Federal agency must identify the responsible personnel to make the determinations of business need. Only SMEs who have created accounts and have been approved by the administrator can get access to the interview recordings that they are assigned to. These controls are built into the platform.

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 and USA Hire-HireVue 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 USA Hire-HireVue and the Rules of Behavior for all information types.

Responsible Officials

J. Patrick Sharpe, Ph.D.

USA Hire Program Manager

Federal Staffing Center

Approval Signature

Signed copy on file with the OPM Chief Privacy Officer

Kellie Cosgrove Riley

Chief Privacy Officer