



Privacy Impact Assessment of Workday Government Cloud “WGC”

System Owner:

Board of Governors of the Federal Reserve System (“Board”) Division of Management and
Division of Financial Management

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Description of the IT system:

Workday Government Cloud (“WGC”) is the Board’s enterprise resource planning solution for financial management, human capital management, financial planning, and analytics. Workday Financial Management (“Workday Financials”) functionality includes *financial accounting, financial and management reporting, supplier management and reporting, procurement integrations, supplier accounts (accounts payable functions), customer accounts (accounts*

receivable functions), budget tracking, capital and operational projects tracking, business assets tracking, employee expenses, critical banking & settlement functions, and reporting & dashboarding).

Workday Human Capital Management (“Workday HCM”) functionality includes *job requisitioning, onboarding of new hires, creating and maintaining of general employee personnel records, reviewing, and approving compensation of employees, managing payroll, storing employee ratings, and time and attendance tracking, and benefits administration.*

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

The populations within the system include the following:

- Past and present Board employees (Workday HCM and Workday Financials);
- Dependents of Board employees (Workday HCM);
- Beneficiaries of Board employees (Workday HCM);
- Survivor annuitants of Board employees (Workday HCM);
- Individuals under consideration for Board employment (applicants) (Workday HCM and Workday Financials);
- Past and present Board contract workers (including common law employees) (Workday HCM);
- Emergency contacts (Workday HCM);
- Federal Reserve System employees¹ (Workday HCM and Workday Financials); and
- Suppliers/Applicants and Customers with whom the Board does business (Workday Financials).

Appendix A includes the information types for each population in the system.

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

Both Workday HCM and Workday Financials rely on the same employee data (including former employee data).

Workday HCM:

Individuals provide information about themselves as the applicant during the recruiting and onboarding phases where such information is entered into Workday. Such individuals also provide information on associated dependents (including spouses), beneficiaries, survivor annuitants, and emergency contacts during the onboarding process. Information about past and present Board employees and retirees is collected in this manner. Board Human Resources personnel also enter Board-assigned information about employees and contract workers into this system.

¹ For contingency purposes only.

Workday Financials:

Information about Suppliers and Applicants will be collected and maintained in Coupa, the Board's procurement and supplier management system. This original data and any updates will be entered into Coupa and subsequently brought into Workday Financials via integration. Customer information is supplied directly by customers themselves via email or mail and manually entered by accounting. Applicant's travel information enters Workday via an integration with E2 Sato which will send information to Workday about individuals for travel reimbursements.

3. Purposes for which the information is being collected:

For Board employees, the information in WGC allows for the processing of personnel transactions related to: hiring and onboarding, termination, retirement and calculation of retirement benefits, promotion, awards and compensation, employment status, performance rating, pay and leave calculation, benefits enrollment and administration, which includes the assignment of beneficiaries and dependents and the calculation of benefits eligibility, organization assignments, and time and attendance administration including the calculation of leave eligibility. This information is also used for strategic workforce reporting. During the initial conversion process to the use of this system, historical information was used to build individual employee profiles.

For beneficiaries and dependents of Board employees, information is collected to properly administer benefits provided by the Board. For emergency contacts, this information is collected in order to contact an individual on a Board employee's behalf in case of an emergency. Contract worker information is used to assist in onboarding, track non-employee personnel within the organization, and for strategic workforce reporting. Survivor Annuitant information is used to track non-employee personnel that have a beneficiary claim. Federal Reserve System Employee information is collected for contingency purposes only.

WGC provides a platform for financial accounting, reporting and tracking of the Board's financial spending. The information is stored and maintained in WGC in order to assist with financial accounting processes and reporting, ensure the Board can receive payments from customers and make payments to suppliers, and enable reporting on all related financial transactions at both detailed and summary levels.

4. Who will have access to the information:

Access to the information maintained in WGC is limited to authorized users, which consists of Board employees, Federal Reserve System employees (for contingency purposes), and contract workers (including employees of Workday) who access the information on a need-to-know basis. Access to the information is restricted to that which is required in the performance of the user's duties.

Workday HCM:

In addition, the information may also be disclosed for the purposes set forth in the System of Records entitled BGFRS-1, "FRB—Recruiting, Placement, and Onboarding Records."

Biographical, demographic, and educational information may be disclosed for the purposes set forth in the System of Records entitled BGFRS-4, “FRB—General Personnel Records.” If provided, the Hire’s race, gender, and ethnicity information may be disclosed for the purposes set forth in the System of Records entitled BGFRS-24, “FRB—EEO General Files.” Performance information may be disclosed for the purposes set forth in the System of Records entitled BGFRS-27, “FRB—Performance Records.” Additional benefits information may be disclosed for the purposes set forth in the System of Records entitled BGFRS-29, “FRB—Benefits Records.” Personnel management information related to training and educational opportunities may be disclosed for the purposes set forth in the System of Records entitled BGFRS-30, “FRB—Academic Assistance Program Files.” OIG Personnel information may also be disclosed for the purposes set forth in the System of Records entitled OIG-2, “OIG—Personnel Records”.

Workday Financials:

Furthermore, the information may also be disclosed for the purposes set forth in the System of Records entitled BGFRS-1, “FRB—Recruiting, Placement, and Onboarding Records.” Direct deposit and payroll information may be disclosed for the purposes set forth in the System of Records entitled BGFRS-7, “FRB—Payroll and Leave Records.” Supplier information may be disclosed for the purposes set forth in the System of Records entitled BGFRS-9, “FRB—Supplier Files.”

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):

Workday HCM:

Individuals do not have the ability to consent to particular uses of their information contained in Workday HCM. Individuals who decline to provide required information may adversely impact their employment or other status at the Board.

Workday Financials:

Individuals do not have the ability to consent to uses of their information contained in Workday Financials. Individuals may decline to provide required information as suppliers within Coupa but doing so may hinder their ability to become a supplier for the Board. Customers may also decline to provide their information in which case the Board will not be able to bill.

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

Individuals are responsible for ensuring the records in this system are accurate for any of the dependents, spouses, beneficiaries, emergency contacts, and/or survivor annuitants associated with the employee’s record, and bank accounts. Board Human Resources personnel are responsible for reviewing and maintaining the majority of the WGC data. Board employees and contract workers have the ability to either update information themselves or request an update by Human Resources. WGC provides data entry validation checks to ensure the information is

entered correctly. Accuracy is ensured by a combination of field restrictions and user confirmation.

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

The Board is currently reviewing data purging options within Workday. When the data purging solution is implemented, the following record retention periods will be in effect:

- Payroll records are retained for fifty-six years.
- Time and attendance records are retained for three years or after a GAO audit (whichever is sooner).
- Office Personnel Folder (OPF) records are retained for the appropriate period which ranges from when superseded or obsolete to one hundred twenty-nine years old, but longer retention is authorized if required for business use.

Until a solution is developed, the data will be retained indefinitely.

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

WGC tracks individual user actions within the system. The audit and accountability controls are based on NIST and Board standards which, in turn, are based on applicable laws and regulations, including the Federal Risk and Authorization Management Program (FedRAMP). The controls assist in detecting security violations and misuse of information in WGC. The Board is solely responsible for a subset of the total controls for this system, has joint responsibility for another subset of controls with the Cloud Service Provider (CSP), and the CSP is solely responsible for the final subset of controls.

Access to WGC is restricted to authorized Board employees and contract workers who require access for official business purposes. FRS Employees also have access to the systems for contingency purposes. Users will login via single sign on, which is controlled by the Board's identity management service. Users are classified into different roles and access and usage rights are established for each role. User roles are used to delineate between the different types of access requirements, so users are restricted to only accessing PII data that is required in the performance of their duties.

Periodic audits and reviews are conducted to determine whether individual users still require access, have the appropriate role, and whether there have been any unauthorized changes to information maintained in the Workday system. This system undergoes an annual review under the Federal Information Security Modernization Act (FISMA).

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):

The Workday HCM module is covered by the following Systems of Records entitled BGFRS-1, "FRB—Recruiting, Placement, and Onboarding Records"; BGFRS-4, "FRB—General Personnel Records"; BGFRS-24, "FRB—EEO General Files"; BGFRS-27, "FRB—Performance

Management Program Records”; BGFRS-29, “FRB—Benefits Records”; BGFRS-30, “FRB—Academic Assistance Program Files”; and OIG-2 “OIG Personnel Records”.

The Workday Financials module is covered by the following Systems of Records entitled BGFRS-1, “FRB—Recruiting, Placement, and Onboarding Records”; BGFRS-7, “FRB—Payroll and Leave Records”; and BGFRS-9, FRB—Supplier Files”.

Reviewed:

//signed//

Andrew Krug
Senior Agency Official for Privacy

9/27/2023

Date

//signed//

Kofi Spong
Chief Information Officer (Interim)

9/27/2023

Date

Appendix A:

Past and Present Board Employees

- Name (Legal name, legal name history, preferred name);
- Position information (Hire reason, location, manager, employee ID, position, job family, job profile, job history, manager information, time type, work email, work phone, work address, network ID, termination information, security clearance, etc.);
- Service information (Hire date, original hire date, first day of work, continuous service date, end of employment date, length of service, time in position and profile, benefits service date, seniority date, service credit(s), time off, time and attendance, pay slip(s), retirement information, service credits, etc.);
- Salary and payment information (Total salary & allowances, base pay, currency, frequency, compensation package, grade, bonus history, payment elections, benefit plan(s), coverage dates, tax information);
- Personal information (Home address, home phone, home email, gender, gender identity, date and place of birth, age, photo, dependents, beneficiaries, emergency contact, marital status, race, ethnicity, veteran/military status, disability status, social security number, passport/visa information, domestic partner designation, relatives at the Board, education information, reasonable accommodation date, date of death, etc.); and
- Additional information (training and assignment information for emergencies, financial disclosure flag, drug testing flag).

Dependents of Board Employees

- Legal Name;
- Gender;
- Dates of Birth and Death;
- Relationship to employee;
- Disability status;
- Primary address, phone, and email address;
- Additional address; and
- Social security number.

Beneficiaries of Board Employees

- Legal Name;
- Gender;
- Dates of Birth and Death;
- Relationship to employee;
- Disability status;
- Primary address, phone, and email address;

- Additional address; and
- Social security number.

Survivor annuitants of Board Employees

- Name (legal and preferred);
- Home address, phone, and email;
- Work address, phone, and email;
- Information regarding associated Board employee (benefit plan, coverage information, position information, hire date(s), length in service, time in position and profile, organization, worker history);
- Social security number; and
- Emergency contact;

Individuals under consideration for Board employment (Applicants)

- Name (legal and preferred);
- Personal information (Home address, home phone, home email, date and place of birth, age, gender, marital status, race and ethnicity, citizenship status, veteran status, social security number, emergency contact);
- Service information (Hire date, original hire date, first day of work, continuous service date, end of employment date, length of service, time in position and profile, benefits service date, seniority date); and
- Salary and payment information (Total salary & allowances, base pay, currency, frequency, grade, compensation package, withholdings).

Board Contract workers (including common law employees) and Federal Reserve System employees

- Name (legal and preferred);
- Personal information (home address, home phone, home email, social security number, emergency contact, worker history);
- Position information (business address, business phone, business email, location, manager, contingent worker ID, network ID, position, job profile and family, time type, contract information, time in position and profile);

Emergency contacts

- Legal name;
- Relationship with Board employee;
- Disability status;

- Primary address, phone, and email; and
- Additional address and phone.

Suppliers

- Banking information;
- Contact and address information;
- Tax reporting information (some of this data will contain PII, such as Tax ID information)

Customers

- Contact and address information (at a minimum, only a name and address are required for a customer to be created in Workday)