



Privacy Impact Assessment of Employee and Family Services System

For Questions or Comments, please email: privacy.comments@frb.gov

Description of the IT system:

The Board of Governors of the Federal Reserve System's (Board) Division of Management People, Strategy & Operations, a human resources function (referred to "HR" hereinafter), provides employee and family services ("Employee and Family Services System") through a third-party vendor on behalf of the Board. These services include:

- Backup Care,
- College Coaching,
- Special Educational Needs, and
- Tuition Assistance Program Administration.

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

This system collects information about Board employees and their family members, as well as emergency contact information provided by Board employees. Board employees register for in-scope services on the vendor's web portal and provide additional personal details (either required or optional) for their selected service(s). After completing the registration process, Board employees use the link on the web portal to access their personally identifiable information (PII)¹ and the features of the service(s) they chose. Employees access the vendor's portal using a username and password or through single sign-on.

The table below lists information collected for each service, the source of the information, and whether information is required, voluntary, or not applicable ("N/A").

¹ PII is information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual. The Office of Management and Budget (OMB), OMB Circular A-130, *Managing Information as a Strategic Resource* (July 28, 2016).

Information Collected	Source	Backup Care	College Coaching	Special Educational Needs	Tuition Assistance Program Administration
First Name (Board employee)	Board	Required	Required	Required	Required
Last Name (Board employee)	Board	Required	Required	Required	Required
Work Email Address	Board	Required	Required	Required	N/A
Employee ID #	Board	Required	Required	Required	Required
Phone Number	Employee	Required	Required	Required	N/A
Educational Records	Employee	N/A	Required	Required	N/A
Job Title	N/A	N/A	N/A	N/A	Required
Department	N/A	N/A	N/A	N/A	Required
Hire Date	N/A	N/A	N/A	N/A	Required
Termination Date	N/A	N/A	N/A	N/A	Required
Manager Name and Manager ID	N/A	N/A	N/A	N/A	Required
Country	N/A	N/A	N/A	N/A	Required
Name of dependent (child, elder, or student)	Employee	Required	Required	Required	N/A
DOB of dependent (child or elder)	Employee	Required	Required	Required	N/A
Gender of dependent (child or elder)	Employee	Required	Required	Required	N/A
Emergency contact	Employee	Required	N/A	N/A	N/A
Dietary restrictions	Employee	Required	N/A	N/A	N/A
Payment Information	Employee	Required	N/A	N/A	N/A
Health Data (e.g., inoculations)	Employee	Required	Voluntary ²	Required	N/A
Race/Ethnic Origin	Employee / Family Member	Voluntary ³	Voluntary ³	N/A	N/A
Home Zip Code	Employee	Required	Required	Required	N/A

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

Employee information is provided to the vendor on a weekly basis.

In order to identify eligible employees, on a weekly basis the Board sends an encrypted outbound HR eligibility file from Workday⁴ to the vendor with employee profile information (first and last

² Allergies, prescriptions, and inoculations information may be shared with the vendor if they impact learning and educational needs for college advising services.

³ See, *Workday Government Cloud Privacy Impact Assessment*. <https://www.federalreserve.gov/privacy-impact-assessments.htm>.

⁴ *Id.*

name, employee ID, and email address). In return, the Board receives reports on the value of those employee benefits for the purpose of imputing income.

Information for dependents and emergency contacts is entered directly by Board employees.

Employees log onto the vendor's service website (e.g., childcare, eldercare, student loan repayment) to submit service requests, modify requests, or delete requests. The web-based applications help manage the flow of information between the vendor and employees, care recipients or their guardians, and tuition reimbursement beneficiaries.

3. Purposes for which the information is collected:

Information is collected to assist the provider in determining benefits eligibility and in calculating benefits.

4. Who will have access to the information:

Access to the Employee and Family Services System is restricted to authorized Board users who require access for official business purposes. Users are classified into different roles to delineate between different types of access rights. Periodic audits and reviews are conducted to determine whether users still require access, have the appropriate role, and whether there have been any unauthorized changes in any information maintained in the Employee and Family Services System. The vendor also has access to limited data (employee name, email and phone number) provided by the Board and employees for purposes of providing customer service.

Disclosures may also be under the Freedom of Information Act (5 USC §552), and the Privacy Act of 1974 (5 USC §552a) in accordance with the applicable System of Records Notices (BGFRS-4, *General Personnel Records*; BGFRS-29, *Benefits Records*; and BGFRS-30, *Academic Assistance Program 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):

Employees may decline to provide information requested through the vendor's web platform, but that may impact their access to certain benefits (e.g., backup care). Employees also have an opportunity to opt-out of receiving marketing information.

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

The Board relies upon users to update their information as necessary.

7. The length of time the data will be retained:

Records covered by BGFRS-4, *General Personnel Records* are retained for the appropriate period, which ranges from when superseded or obsolete to 129 years old. The retention for Official Personal Files for employees separated prior to December 31, 1973, is currently under review. Until the review is completed, these records will not be destroyed.

The retention period for records covered by BGFRS-29, *Benefits Records* is currently under review. Until the review is completed, these records will not be destroyed.

The retention period for records covered by BGFRS-30, *Academic Assistance Program Files* is currently under review. Until the review is completed, these records will not be destroyed.

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

This system applies applicable security and privacy controls in National Institute of Standards and Technology's (NIST) Special Publication 800-53 (Rev. 5), *Security and Privacy Controls for Information Systems and Organizations*, in accordance with the Federal Information Security Modernization Act (FISMA); NIST's Federal Information Processing Standard (FIPS) 140-2, *Security Requirements for Cryptographic Modules* for encrypting data at rest and in transit; and applicable Federal Risk and Authorization Management Program (FedRAMP)⁵ controls for cloud services.

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):

This system is covered by the following Board system of records notices (SORNs): BGFRS-4, *General Personnel Records*; BGFRS-29, *Benefits Records*; and BGFRS-30, *Academic Assistance Program Files*. (see, [Federal Reserve Board - System of Records Notices \(SORNs\)](#)).

Reviewed:

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Date

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Date

⁵ <https://www.fedramp.gov/>.