Privacy Impact Assessment of Taleo Transitions System

Program or application name:
Taleo Transitions System (“Taleo Transitions”)

System Owner:
Board of Governors of the Federal Reserve System’s (“Board”) Management Division

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Description of the IT system:
Taleo Transitions is a cloud-based, FedRAMP certified Software as a Service (“SaaS”) application, which is hosted and maintained by Oracle Corporation
(“Oracle”). Taleo Transitions allows candidates who accepted offers of employment (the “Hire”) to complete some of the pre-employment onboarding documentation online, so that Board staff can process the Hire’s employment. In addition, if an applicant for employment is a potential rehire, the Board uses Taleo Transitions to determine rehire eligibility. Some portion of the pre-employment documentation must be completed on the Hire’s first day. Taleo Transitions is not the final system of record for the information collected by Taleo Transitions, although it will store the information for a brief time after the Hire’s start date as an employee.

After the Hire becomes a Board employee, the information is stored in the appropriate Board system or application. Taleo Transitions will maintain the business email of the new Hire so that Taleo Transitions can assist in the delivery of follow-up surveys.

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

As part of the Board’s onboarding process, Taleo Transitions collects and maintains information about the Hire. The information Taleo Transitions collects varies based on the Hire’s offered position at the Board. Taleo Transitions may contain the following information for each Hire unless specifically noted:

- Biographical information (name, date of birth, birthplace, social security number, gender, marital status, and contact information along with current and mailing addresses);
- Physical information about the individual (such as eye and hair color, height, and weight);
- Demographic information (such as citizenship status, race, and ethnicity);
- Educational information;
- Financial information for payment and tax withholding purposes; and
- The individual’s electronic signature for forms signed electronically in Taleo Transitions.

For those with prior federal or Board service, Taleo Transitions collects information about that prior service. Taleo Transitions also collects personal information about spouses, dependent children, and beneficiaries for benefits and emergency contact purposes (such as their name, relationship to hires, date of birth, social security number, and contact information such as address and telephone number).
2. Source(s) of each category of information listed in item 1:

The Hire and Board staff provide the information collected and maintained in Taleo Transitions. Supplemental information relevant for onboarding, such as email addresses collected during the application process, is automatically imported from the Taleo Recruiting system into Taleo Transitions.

3. Purposes for which the information is being collected:

The Board uses Taleo Transitions to collect certain pre-employment documentation. Board staff use information in Taleo Transitions to inform reports they produce for use outside Taleo Transitions, to ensure onboarding tasks are completed by the Hire in a timely manner, and to ensure necessary data is received for prompt processing. Board staff also use Taleo Transitions to generate emails that facilitate the delivery of post-hire surveys. These surveys, which are completed and stored outside of Taleo Transitions, are for the purpose of monitoring and improving the transition from applicant to new employee.

4. Who will have access to the information:

Access to the information maintained in Taleo Transitions is limited to authorized users consisting of Federal Reserve staff and Oracle’s customer support personnel who have a need to know the information for official business purposes. Access to the information is restricted to the information required in the performance of the user’s duties.

Taleo Transitions is not the permanent recordkeeping system as the information in Taleo Transitions is ultimately stored in the appropriate system of record. Accordingly, 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.” 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.” 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.” Fingerprint information (including eye, hair color, height and weight) may be disclosed for the purposes set forth in the System of Records entitled BGFRS-34
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):

Hires may elect not to complete the onboarding process and rescind their acceptance of the offer. If the Hire chooses to become an employee, however, the Hire must complete the onboarding documentation in Taleo Transitions or on-site at the Board.

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

The Hire is responsible for the accuracy, completeness, and timeliness of the information he or she submits through Transitions. Once a form has been completed and submitted by the Hire, the Hire may not update it in Taleo Transitions. After the Hire is an employee, he or she may subsequently make a request to Board staff in Human Resources to have the information updated. Reports generated by Taleo Transitions will help to ensure information is completed by the Hire in a timely manner. Taleo Transitions also generates emails asking the Hire to complete post-hire surveys.

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

The information collected in Taleo Transitions is stored for 60 days after the Hire’s start date to facilitate onboarding. The Board is maintaining the records of individuals who do not enter on duty (who do not complete the process and become an employee) indefinitely because the Board is currently drafting a proposed record schedule to destroy these files when no longer needed. Until the proposed records retention period is approved, the Board will maintain the records of individuals who do not enter on duty indefinitely. The remaining onboarding records are maintained in the appropriate system of records outside of Taleo Transitions and the data is purged from Taleo Transitions. Taleo Transitions will
maintain contact information to allow Board staff to send post-start date surveys to the Hires.

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

Taleo Transitions has the ability to track 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. The controls assist in detecting security violations and performance or other issues in Taleo Transitions.

Access to Taleo Transitions is restricted to authorized users who require access for official business purposes. Users are classified into different roles and common access and usage rights are established for each role. User roles are used to delineate between the different types of access requirements such that users are restricted to data that is required in the performance of their duties. 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.

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 Board is amending BGFRS-1 “FRB—Recruiting, Onboarding, and Placement Records,” to add the onboarding materials collected electronically from prospective employees in Taleo Transitions. The addition will cover the period of time that the onboarding materials reside in Taleo Transitions before the materials are removed from Taleo Transitions and transferred to the appropriate system of record, as well as the records of individuals who do not enter on duty. Onboarding materials for Hires who become employees of the Board are transferred and maintained in accordance with the appropriate Board system of records, such as BGFRS-4 “FRB—General Personnel Records,” BGFRS-7 “FRB—Payroll and Leave Records,” BGFRS-24 “FRB—EEO General Files,” and BGFRS-34 “FRB—ESS Staff Identification Card File.”
Reviewed:

/signed/  2/27/19
Raymond Romero  Date
Senior Agency Official for Privacy

/signed/  2/27/19
Sharon Mowry  Date
Chief Information Officer