



## **Privacy Impact Assessment of Workday Government Cloud**

For Questions or Comments, please email: [privacy.comments@frb.gov](mailto:privacy.comments@frb.gov)

### **Description of the IT system:**

Workday Government Cloud (“WGC”) is the Board of Governors of the Federal Reserve’s (Board) enterprise resource planning solution for financial management, human capital management, onboarding, financial planning, and analytics. Workday Financial Management (“Workday Financials”) products include 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 project tracking, business assets tracking, employee expenses, critical banking & settlement functions, and reporting & dashboarding.

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

This PIA updates the WGC PIA dated September 27, 2023.

### **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 employees<sup>1</sup> (Workday HCM and Workday Financials); and

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<sup>1</sup> For contingency purposes only.

- Suppliers/Applicants and Customers with whom the Board does business (Workday Financials).

*See the Appendix for data elements collected from different populations in Workday.*

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

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

### Workday HCM:

Individuals provide information about themselves during the recruiting and onboarding phases where such information is entered into Workday. They also provide information on their dependents (including spouses), beneficiaries, survivor annuitants, and emergency contacts during the onboarding process. Information about past and present Board employees and retirees is also collected. Board Human Resources personnel enter Board-assigned information about employees and contract workers into this system. As part of the onboarding process, fingerprints are collected from new hires by the Board's Personnel Security Section and shared with the Department of Defense's Defense Counterintelligence and Security Agency. The fingerprint images are not stored in Workday or retained by the Board.

### Workday Financials:

Information about suppliers and applicants is collected and maintained in the Board's procurement and supplier management system. This data, along with any updates, is entered into this system and subsequently brought into Workday Financials. Financial information (e.g., job applicant's travel reimbursement requests) is supplied by individuals through email or mail, and manually entered by Board Accounting.

## **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.

For beneficiaries and dependents of Board employees, information is collected to properly administer the benefits provided by the Board. For emergency contacts, this information is collected 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.

WGC provides a platform for financial accounting, reporting and tracking of the Board's financial spending. The information is stored and maintained in WGC to assist with financial

accounting processes and reporting, ensure the Board can receive payments from customers, 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 Bank employees (for contingency purposes), and contract workers (including employees of Workday) who access the information on a need-to-know basis in the performance of their official duties. Disclosures may also be made under the Freedom of Information Act (5 USC §552) and the Privacy Act of 1974 (5 USC §552a) in accordance with the applicable Board System of Records Notices listed below in Section 9.

**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 the required information may adversely impact their employment or other status at the Board.

Workday Financials:

Individuals do not have the ability to consent to particular uses of their information contained in Workday Financials. Individuals may decline to provide their information, but they will be unable to complete their financial transactions.

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

Individuals are responsible for ensuring the accuracy of records related to their 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 WGC data.

Board employees and contract workers can either update their own information or request updates through Human Resources. WGC provides data entry validation checks to ensure the information is entered correctly. Accuracy is maintained through a combination of field restrictions and user confirmations.

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

All Workday records are retained indefinitely.

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

The Board applies applicable privacy and security controls in the National Institute of Standards and Technology's (NIST) Special Publication 800-53 (Rev. 5), *Security and Privacy Controls for Information Systems and Organizations*, at the moderate impact level. Access to WGC is restricted to authorized Board employees and contract workers who require access for official business purposes. Federal Reserve Bank employees also have access to the system for contingency purposes. User roles determine the type of access needed to perform their official 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 to information maintained in WGC.

**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 products are covered by the following Systems of Records Notices 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 products are covered by the following Systems of Records Notices entitled:** BGFRS-1, "FRB—Recruiting, Placement, and Onboarding Records;" BGFRS-7, "FRB—Payroll and Leave Records;" and BGFRS-9, FRB—Supplier Files."

**Reviewed:**

**CHARLES YOUNG** Digitally signed by CHARLES YOUNG  
Date: 2025.04.25 13:17:27 -04'00'

Charles Young  
Senior Agency Official for Privacy

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Date

**JEFFREY RIEDEL** Digitally signed by JEFFREY  
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Jeffrey Riedel  
Chief Information Officer

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Date

## **Appendix: Data elements collected from each population in Workday**

### **Past and Present Board Employees**

- Name (Legal name, legal name history, preferred name);
- Position information (e.g., 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);
- Service information (e.g., 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);
- 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);
- Financial information (bank account number and routing number) for payment and tax withholding purposes;
- The individual's electronic signature for forms signed electronically;
- Personal information (e.g., home address, home phone, home email, sex, 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, job history, languages, certifications, and education, reasonable accommodation date, date of death);
- Hair color, eye color, height, weight; and
- Additional information (training and assignment information for emergencies, financial disclosure flag, drug testing flag).

### **Dependents of Board Employees**

- Legal Name;
- Sex;
- 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;
- Sex;
- 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, sex, 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; and
- 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).