Privacy Impact Assessment
of the
ServiceNow HR Service Delivery “HRSD” System

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

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Description of the IT system:
The ServiceNow HR Service Delivery (HRSD) System is a customer relationship management (CRM) module within the cloud-based ServiceNow platform that focuses on employee relations and case management, as well as providing an employee service center portal solution for active employee self-service. This system manages human resource (HR) and payroll inquiries related to current and former Board employees. The system provides the following functions: knowledgebases for active employee self-service, integration to Computer Telephony Integration
(CTI), case management\(^1\), workflows with approvals, Service Level Agreements (SLAs) management, notifications, reporting, and form/document management.

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

The population within this system includes only current and former Board employees. However, as needed to effectively document facts pertinent to an Employee Relations (ER) case, information regarding other individuals may appear in this system via several free-form fields which enable documentation.

ServiceNow HRSD collects the following information for two types of profile: the User Profile and the HR Profile. The User Profile is required for any user to access the ServiceNow platform and is populated from the Board’s identity and access system. The HR Profile is populated from the Board’s personnel system and is used to populate basic personal information about an employee. Only active Board employees have User Profiles and HR Profiles in HRSD.

Former employees who need support get in contact via phone and a generic case can be opened with only the minimal PII to obtain service. If a former employee is not found in this system, identity verification is carried out by reviewing the Board’s personnel system outside of HRSD.

**User Profile**

- First and last name
- Division
- Work email address
- Name of manager
- Title

**HR Profile**

- Legal first name and middle name
- Date of birth
- Social Security number
- Employment information (employee number, start and end dates, and employment type)
- Home address
- Leave status
- Marital Status
- Personal contact information (personal email and mobile number)
- Work contact information (work phone and mobile phone\(^2\))
- Active or inactive status
- Gender

\(^1\) The term “case” is used to identify a ticket or workflow process in HRSD.

\(^2\) Not all individuals in this system are assigned a mobile number.
- Salary
- Officer flag
- Manager flag
- Salary grade
- Race/Ethnicity

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

For current employees, the initial source for the HR Profile is the employee themselves during the recruiting and onboarding phases where such information is entered into the Board’s human resources system, which is then used to populate the HR Profile in HRSD. The Board’s identity and access system obtains the initial information for the User Profile from the Board’s human resources system. HRSD then obtains the User Profile information from the Board’s identity and access system. The current employee supplies any necessary additional information to resolve a case.

For former employees, the initial source of information is the individual via a phone call with a human resources representative who verifies the former employee’s identity and completes the former employee’s request using information located in the Board’s human resources system. During the resolution of a case, some of the information obtained from the Board’s human resource system could be recorded within the case itself by the Board employee working on the case.

Information related to the ER module may be provided by an employee or former employee themselves or may be solicited by a Board employee during the course of an issue resolution.

3. **Purposes for which the information is being collected:**

HRSD automates certain HR interactions and provides a single platform for all HR services to originate. The information that is collected upon creating a case within HRSD ensures that HR service requests can be properly resolved.

The information contained in the HR Profiles and User Profiles is utilized to support verification that a person calling into the HR helpdesk is a current or former Board employee, to enable an automated workflow, to assist in the completion of forms created as part of the delivery of an HR service, to send notifications, and to restrict access to certain types of services and knowledgebase content.

The information collected within ER cases ensures relevant information is available, so that involved parties, allegations/issues, investigation notes, corrective actions, and resolutions are properly documented. The information also is utilized in ER reporting.
The information collected within a general helpdesk case is utilized to describe the request and to document the resolution that was provided to the employee or former employee.

4. **Who will have access to the information:**

Access to the information maintained in ServiceNow HRSD is limited to authorized users, which consists of Board employees 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. This information may also be disclosed for the purposes set forth in the Systems of Records entitled BGFRS-6 “Disciplinary and Adverse Action Records” and BGFRS-26 “Employee Relations Records.”

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):**

Individuals do not have the ability to consent to uses of their information contained in the HR Profile or User Profile. With regards to data in a specific case, individuals may decline to provide information but doing so may impact obtaining information related to their case, inquiry, or request.

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

An individual may request changes in the source human resources system or access and identity system if the information is out of date, incorrect, or incomplete. HRSD does not have the ability to make direct changes in those systems.

The data captured in the administration of a case is the responsibility of the Board employee working the case and cannot be accessed by the person who opened the case. Should the Board become aware of a discrepancy in the information within this system, corrective action will be taken to update that information.

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

The official retention period for records in connection with ER cases is 7 years after closure. For help desk-related records it is one year after case closure. The Board is currently reviewing data purging options within the ServiceNow platform for case data. 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:**
ServiceNow HRSD 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 ServiceNow HRSD.

Access to ServiceNow HRSD is restricted to authorized users within the Board 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 in any information maintained in ServiceNow HRSD.

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 ServiceNow HRSD system is covered by two Systems of Records entitled BGFRS-6, “FRB—Disciplinary and Adverse Action Records” and BGFRS-26, “FRB—Employee Relations Records.” Information governed by the following Systems of Records is utilized on a read-only basis by ServiceNow HRSD: BGFRS-1, “FRB—Recruiting, Placement and Onboarding Records” and BGFRS-4, “FRB—General Personnel Records.”

Reviewed:

/signed/ Charles Young for Raymond Romero Senior Agency Official for Privacy

1/6/2022 Date

/signed/ Sharon Mowry Chief Information Officer

1/7/2022 Date