



Federal Trade Commission
Privacy Impact Assessment

**Federal Trade Staffing
and Employment Express
(FT-SEE)**

Updated August 2018

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1 System Overview

1.1 Describe the project/system and its purpose.

The Federal Trade Commission's (FTC or Commission) Human Capital Management Office (HCMO) is responsible for recruiting and staffing employees for the FTC. To maximize the efficiency of the recruitment and staffing process, HCMO utilizes an automated web-based system known as the Federal Trade Staffing and Employment Express (FT-SEE) system, which enables the electronic submission and evaluation of job applications for open positions at the FTC. The system is used to attract qualified and talented job seekers, while simplifying the application process for both candidates and evaluators. FT-SEE contributes to the Commission's mission by allowing staff to recruit, evaluate, and hire the most qualified applicants while minimizing the time and resources allocated by HCMO.

FT-SEE, which is an Office of Personnel Management (OPM) information system, is hosted through a commercial application from Monster Government Solutions (MGS) called Monster Hiring Management. FT-SEE automates the recruitment, assessment, referral, and notification processes involved in hiring at the FTC. Applicants who visit the Federal Government's official website for employment information (www.usajobs.gov or USAJOBS), which is also managed by OPM, can use that website's search function to locate listings for current FTC vacancies by locality and job type, as well as summaries detailing each position.¹ Upon viewing these summaries, applicants can submit their applications via FT-SEE by clicking "Apply Online" within the summaries. When applicants click "Apply Online," they are automatically directed to the FT-SEE website. In order to continue to the FT-SEE website, applicants must first have registered on USAJOBS by creating a user name and providing their personal information, including Social Security Number (SSN). Much of this personal information (including veterans' preference, demographic information, and resume information) is then transferred to FT-SEE; SSNs are not transferred or stored within FT-SEE. Within the FT-SEE website, applicants can complete their online application by submitting additional personal information, résumés, as well as responses to a series of questions designed specifically for each vacant position. The FT-SEE website also allows applicants to view the status of their applications once they have been submitted.

Subsequently, HCMO staff can access FT-SEE to review the submitted application electronically. HCMO staff do not have access to applicant information on www.usajobs.gov. They can only access information supplied by the candidate via FT-SEE. After HCMO's initial assessment of the applicant's eligibility for the position, the candidate's application is referred to the hiring official for that position. The hiring official is provided with access to FT-SEE to review the referred candidates' application information and select the preferred candidate for the position. HCMO then notifies the candidate either through the use of emails or letters generated via FT-SEE or by directly communicating with them via the contact information provided by the candidate.

1.2 What specific legal authority allows for the collection, maintenance, or dissemination of information for this project/system?

The FTC rates applicants for Federal jobs under the authority of sections 1104, 1302, 3301, 3302, 3304, 3320, 3361, 3393, and 3394 of title 5 of the United States Code (USC). The information

¹ See OPM's [USA Staffing \(USAS\) Privacy Impact Assessment](#) for more information about USAJOBS.gov.

requested in FT-SEE is needed to evaluate candidates' qualifications and request information related to citizenship and military service.

2 Data Type, Sources, and Use

2.1 Specify in the table below what types of personally identifiable information (PII)² may be collected or maintained in the system/project. Check all that apply.

The information maintained in FT-SEE consists of personal data, job vacancy data, and applicant assessment results. This information primarily is collected directly from the applicant; however, assessment results in the system are entered into the system by HCMO staff. The system maintains a separate record for each vacancy announcement for which an applicant applies.

<i>PII Elements: This is not intended to be an exhaustive list. Specify other categories of PII as needed.</i>		
<input checked="" type="checkbox"/> Full Name	<input type="checkbox"/> Biometric Identifiers (e.g., fingerprint, voiceprint)	<input type="checkbox"/> User ID
<input type="checkbox"/> Date of Birth	<input type="checkbox"/> Audio Recordings	<input checked="" type="checkbox"/> Internet Cookie Containing PII
<input checked="" type="checkbox"/> Home Address	<input type="checkbox"/> Photographic Identifiers (e.g., image, x-ray, video)	<input checked="" type="checkbox"/> Employment Status, History, or Information
<input checked="" type="checkbox"/> Phone Number(s)	<input type="checkbox"/> Certificates (e.g., birth, death, marriage, etc.)	<input type="checkbox"/> Employee Identification Number (EIN)
<input type="checkbox"/> Place of Birth	<input type="checkbox"/> Legal Documents, Records, Notes (e.g., divorce decree, criminal records, etc.)	<input checked="" type="checkbox"/> Salary
<input type="checkbox"/> Age	<input type="checkbox"/> Vehicle Identifiers (e.g., license plates)	<input checked="" type="checkbox"/> Military Status/Records/ ID Number
<input type="checkbox"/> Race/ethnicity	<input type="checkbox"/> Financial Information (e.g., account number, PINs, passwords, credit report, etc.)	<input type="checkbox"/> IP/MAC Address
<input type="checkbox"/> Alias	<input type="checkbox"/> Geolocation Information	<input type="checkbox"/> Investigation Report or Database
<input type="checkbox"/> Sex	<input type="checkbox"/> Passport Number	<input type="checkbox"/> Driver's License/State ID Number (or foreign country equivalent)
<input checked="" type="checkbox"/> Email Address		<input checked="" type="checkbox"/> Other (<i>Please Specify</i>): See below
<input type="checkbox"/> Work Address		
<input type="checkbox"/> Taxpayer ID		
<input type="checkbox"/> Credit Card Number		
<input type="checkbox"/> Facsimile Number		
<input type="checkbox"/> Medical Information		
<input checked="" type="checkbox"/> Education Records		
<input type="checkbox"/> Social Security Number		
<input type="checkbox"/> Mother's Maiden Name		

FT-SEE collects citizenship status and the applicant's résumé, which may include grade/band and veterans preference. It may also collect college transcripts and military service records. The FT-SEE system also collects demographic information, if voluntarily submitted by the applicant. HCMO collects information, such as ethnicity, race, disability, gender, and veterans preference to ensure recruitment efforts are inclusive of all individuals. Demographic information is used only for statistical purposes and is not used to identify individual applicants.

² Per OMB Circular A-130, personally identifiable information (PII) means 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.

2.2 What types of information other than PII will be collected, disseminated, or maintained by the project/system? Provide a general description below and be sure to include all data elements.

In addition to the personal information indicated above in 2.1, FT-SEE also collects answers to questions specific to the open position, the applicant’s notification preferences, and secret question and answer (for password retrieval purposes).

FT-SEE collects information for each job vacancy for which an applicant may apply. In situations where two announcements are posted for a particular position (one for Merit Promotion and one for Delegated Examining), and the applicant chooses to apply for both, the system will record these applications separately.

Some additional documentation may be required, such as proof of service connected to disability, and responses to core questions. Examples of core questions may include affirming whether the applicant is or has been a Federal employee, availability to travel, etc.

FT-SEE also maintains information generated by HCMO for each job vacancy for which an applicant applies. This information includes qualifications determination (qualified or not qualified), the applicant rating (best qualified, qualified, or not qualified), and, in instances where scoring is used to determine qualifications, the numerical score for the applicant will be maintained. Also maintained is information about whether the applicant was referred to the hiring official for consideration and, if the candidate was referred, whether they were selected by the hiring official.

2.3 What is the purpose for collection of the information listed above?

The information in FT-SEE is collected to support the hiring of capable and qualified candidates for advertised job vacancies within the FTC. The information is used to evaluate applicants’ qualifications, to check references, verify applicants’ statements, document the assessment and selection process, to contact applicants about the disposition of their applications, and to prepare statistical reports. Demographic information collection is used only in the aggregate for statistical reporting purposes.

2.4 What are the sources of the information in the system/project? How is the information collected?

<i>Source of Data</i>	<i>Type of Data Provided & How It Is Collected</i>
Individual Members of the Public (Applicants)	Individuals who wish to be considered for employment at the FTC voluntarily provide their personal information through FT-SEE. This information includes name, grade/band, veterans preference, other personal data, résumé, additional required documentation, and responses to core questions. While some of this data is collected directly from the applicant via the FT-SEE website, other personal information is transferred to FT-SEE from USAJOBS as specified below.
USAJOBS	USAJOBS is the Federal Government’s official employment site. Applicants must first sign into the USAJOBS website to begin the application process before continuing onto the FT-SEE website.

<i>Source of Data</i>	<i>Type of Data Provided & How It Is Collected</i>
	USAJOBS collects the following information to transfer to FT-SEE: full name, home address, phone number, email, country, citizenship, veterans' preference, and demographic information.
FTC HCMO	Authorized HCMO employees can log into FT-SEE to review applicant profiles and determine if they are eligible candidates for employment with the FTC. This information may include vacancy data, qualification determination, numerical score, applicant rating, and whether the applicant was referred to or selected by the hiring official.

3 Data Access and Sharing

3.1 In the table below, specify the systems/applications and groups (both FTC and non-FTC) that will have access to or share data in the system/project.

<i>Data Will Be Accessed By and/or Provided To:</i>	<i>How and Why the Data Will Be Accessed/Shared</i>
Individual Applicants	Individuals must first create a USAJOBS account and store certain required and voluntary data within the USAJOBS system. When applying for positions with the FTC, applicants on USAJOBS are directed to the FT-SEE portal to complete the application process. Certain information is pre-populated from the applicant's USAJOBS account such as name, home address, contact phone numbers, and email address. They can also claim veterans' preference and provide demographic data; these data elements are not, however, linked to the individual's application. Applicants can also attach additional documents and forms that may contain PII (resume, cover letter, Form SF-50, Form SF-15, Form DD-214, school transcripts, letters of recommendation, performance appraisals, etc.). Applicants have the ability to log in to their USAJOBS account and gain portal access to FT-SEE to check the status of their FTC applications and review materials. Profile changes to such items as personal information, application materials, documents, etc., are made within USAJOBS, not FT-SEE.
FTC Staff and Contractors	Access to FT-SEE is limited only to those FTC employees or contractors directly involved in the recruitment and hiring process (e.g., HCMO specialists, hiring manager) or system administrators responsible for maintaining the system. HCMO specialists and hiring managers use the system to review applications submitted by potential candidates.
Other Federal Government Agencies	Information may be provided to other federal agencies in instances where the FTC is legally obligated to share data. Applicant information may be disclosed to OPM for audit purposes, shared with other agencies under routine uses, or provided to other government entities as required by law (e.g., official Congressional or Government Accountability Office (GAO) request).

<i>Data Will Be Accessed By and/or Provided To:</i>	<i>How and Why the Data Will Be Accessed/Shared</i>
Other External Parties	In order to conduct background investigations or credit checks for potential employees and contractors, the FTC may share limited applicant information with other third parties (individual and commercial). This may include credit bureaus, applicants' past employers, personal reference points of contact, etc.
Monster Government Solutions (MGS)	In the course of performing business functions on behalf of MGS, authorized companies and individuals employed by MGS may have access to system data maintained about FTC applicants for legitimate business purposes (e.g., hosting web servers, analyzing data, and providing customer care). These individuals and companies are prohibited from sharing such data with other parties without the agency's express knowledge and consent as set forth in the Non-Disclosure Agreement between the FTC and MGS.

3.2 Do contractors and/or third party service providers have access to data in the project/system? If yes, explain what privacy requirements are in place to ensure that data is properly protected.

Yes, see 3.1. All FTC contractor staff are subject to the same rules and policies as FTC employees. Authorized users have access control restrictions based on their job profiles. In addition, contractors who have access to the FT-SEE application are required to sign a non-disclosure agreement.

FT-SEE is an OPM-owned information system that is hosted by a third party service provider, MGS. Information in FT-SEE is limited to those MGS staff that have been authorized to access the information for carrying out their job duties. MGS employees ensure that privacy responsibilities and procedures are included in the annual security awareness training for its employees. Role-based training is provided to individuals with responsibility for handling PII and privacy requirements.

3.3 If you answered “yes” to 3.2, describe the privacy incident response plan maintained by the contractor’s organization or third party service provider.

MGS’s privacy incident response procedures include an “Incident Handling Checklist” with step-by-step instructions for dealing with suspected or confirmed incidents. The Checklist provides guidelines to incident responders on the major steps that should be performed during three stages of incident handling: (1) Detection and Analysis; (2) Containment, Eradication, and Recovery; (3) and Post-Incident Activity. The actual steps performed may vary based on the type of incident being handled and the nature of individual incidents. Lessons learned, follow-up reports, and performance measures provide reference points that can be used to assist in handling similar incidents in the future. MGS evaluates the effectiveness of its incident response plan and procedures on an annual basis.

4 Notice and Consent

4.1 How are individuals provided with notice prior to the collection of their PII? If notice is not provided, explain why.

- Notice is provided via (*check all that apply*):
- Privacy Act Statement (Written Oral)
 - FTC Website Privacy Policy
 - Privacy Notice (e.g., on Social Media platforms)
 - Login banner
 - Other (*explain*): In addition to the Privacy Act Statement, individuals are also provided with the Purpose and Routine Uses of the information in the system, the Effects of Nondisclosure, as well as a Paperwork Reduction Act Statement.
- Notice is not provided (explain): _____

Applicants are provided with a Privacy Act Statement that notifies them of the collection of their personal data for the purposes of generating an applicant profile. Although providing the information is voluntary, an individual's application may not be considered for employment if they refuse to provide the information.

4.2 Do individuals have the opportunity to decline to provide information or to consent to particular uses of their information (other than required or authorized uses)?

Applying for a position at the FTC is optional and at the complete discretion of the individual. To receive full consideration for employment, applicants must apply and provide all required information within FT-SEE. The application process requires the following: submission of the applicant's résumé, completion of responses to questions related to the qualifications and experience of the applicant. Applicants may limit the amount of personal information provided in the résumé and responses to questions; however, failure to provide complete and correct data may affect accurate assessment of the applicant.

4.3 Are there procedures in place to allow individuals access to their personally identifiable information? Explain.

Applicants create log-in credentials and provide personal information on the USAJOBS website to apply for a desired position at the FTC. When they apply for an FTC position, they are automatically directed from USAJOBS to the FT-SEE website, where they can submit additional information related to their eligibility, demographic information, and answer questions related to the position. Because the applicant's information is transferred to FT-SEE directly from USAJOBS, the applicant can readily access the data in FT-SEE via the USAJOBS website prior to application submission. Once an application has been submitted for a particular position, the applicant is not able to revise or change the information provided on that application; they may need to contact HCMO directly to discuss options for submitting corrected information.

For information that the individual may have submitted to FT-SEE that is not accessible as described above, individuals may file a [Privacy Act request](#) filed with the FTC's [Freedom of Information Act \(FOIA\) Office](#).

4.4 Are there procedures in place to allow individuals the ability to correct inaccurate or erroneous information? What is the process for receiving and responding to complaints, concerns, or questions from individuals? Explain.

Individuals have the ability to update or correct personal information by logging into USAJOBS and updating their information on the USAJOBS website, so that erroneous or outdated information does not get transferred to the FT-SEE website. Once they have initiated the application process for a particular job, applicants who provide inaccurate or erroneous information on the FT-SEE website have the ability to make changes and updates to their application information on FT-SEE until they submit their application. After the application has been submitted, applicants who realize that they submitted an incorrect form or provided incorrect information may contact HCMO directly via phone or email and make arrangements for submitting the correct form or information.

5 Data Accuracy and Security

5.1 Are there procedures in place to ensure that the information maintained is accurate, complete, and up-to-date?

It is the applicant's responsibility to ensure the information submitted via FT-SEE is accurate, complete, and up-to-date. The vacancy announcement explains in detail what applicants are required to submit in order for their application materials to be considered complete. If application materials are incomplete, HCMO will deem the applicant ineligible. If the applicant realizes that the information that he or she has provided is inaccurate or incomplete, the applicant can take steps to correct the information as detailed above in 4.4.

5.2 Are there administrative procedures and technical safeguards in place to protect the data in the system/project? What controls are in place to ensure proper use of the data? Please specify.

Reasonable and appropriate safeguards are in place to protect information collected through the FT-SEE system. For example, applicants create and maintain their individual accounts via USAJOBS, which they can then use to apply for vacant job positions with the FTC. Applicants enter their information through a secure USAJOBS webpage, and their data is stored on MGS's secure servers. All system data compiled or generated as part of the FTC application process in FT-SEE is owned by the FTC; although MGS operates and hosts the website, they do not hold the rights to the data.

All other access to FT-SEE (e.g., to post or revise online job postings, review applicant data or non-identifiable demographic information) is limited to only those FTC staff and contractor personnel directly involved in the recruitment cycle (e.g., HCMO, hiring officials) and/or in data administration (e.g., MGS data managers, relevant FTC IT staff). HCMO staff passwords expire and require a reset after every 90 days. Accounts are locked after 120 days of inactivity and/or after three failed log-in attempts due to incorrect password entry. Similar controls apply to system administrator passwords. HCMO staff sessions are automatically logged out after 30 minutes of inactivity; applicant sessions are automatically logged out after 60 minutes of inactivity. Selecting/hiring officials have only temporary "Read Only" access to the specific data for applicants that they are responsible for reviewing (i.e., no access to any other applicant data). The hiring official's password expires once a

selection has been made and all other applicable work for the case has been completed by HCMO, and the case is closed in FT-SEE.

MGS tests the robustness of administrator and employee passwords by using certain open source or freeware applications. Both server and application logs are reviewed weekly (or more frequently if needed) to monitor access and behavior. Data is transmitted via standard web browsers and is encrypted both at rest and during transmission. MGS ensures the appropriate and secure storage of any cryptographic keys used by Monster Hiring Management and its related systems.

5.3 Has the system/project undergone the appropriate security risk assessment and received authority to operate?

Applicable IT security requirements and procedures mandated by federal law and policy have been met to ensure information is appropriately secured. MGS has conducted an appropriate risk assessment to identify and implement appropriate security controls to protect against risks. The U.S. Department of Interior (DOI) has issued an Authorization to Operate (ATO) for the Monster Hiring Management FT-SEE system; the FTC has leveraged DOI's ATO to continue to operate the FT-SEE system. Monitoring, testing, and evaluation by MGS occurs on a regular basis to ensure that its controls continue to work properly and that information is safeguarded. The FTC's Chief Information Security Officer (CISO) is the point of contact for any security questions related to this project.

5.4 Is PII used in the course of system testing, training, or research? If so, what steps are taken to minimize and protect PII during this process?

MGS makes all efforts to minimize the PII elements collected, and only collects PII elements necessary for the FT-SEE system to function. PII in the system is not used for testing, training, or research.

Not Applicable

6 Data Retention and Disposal

6.1 Specify the period of time that data is retained in the system/project. What are the specific procedures for disposing of the data at the end of the retention period?

FTC will apply the records retention instructions as prescribed by the National Archives and Records Administration (NARA) General Records Schedules (GRS).

7 Website Privacy Evaluation

7.1 Does the project/system employ the use of a website? If so, describe any tracking technology used by the website and whether the technology is persistent or temporary (e.g., session cookie, persistent cookie, web beacon). Describe the purpose of using such tracking technology.

Yes. The FT-SEE system utilizes temporary session cookies in order to maintain and manage user information during user progression through the registration process and online application. There is no use of persistent cookies. Administrator sessions are timed out after 30 minutes of inactivity, and applicant sessions are timed out after 60 minutes of inactivity.

8 Privacy Risks and Evaluation

8.1 Considering the type of information collected and sources of collection, what privacy risks were identified and how were these risks mitigated?

<i>Risk</i>	<i>Mitigation Strategy</i>
Unauthorized access	<p>The potential risk of applicants accessing information of other applicants is mitigated through the initiating point of the application process, USAJOBS. Applicants create an individual account in USAJOBS, which requires an individual login ID and the creation of a unique password. This is external to FT-SEE.</p> <p>FTC selecting officials are assigned a user ID and password and are given access only to positions for which they are responsible for. They are unable to access nor are they permitted access by HCMO to any position that is not within their authority.</p>
Unauthorized sharing of information	<p>Procedures have been implemented to minimize the potential risk of inappropriate disclosure of applicant information. As with all users, HCMO users with access to FT-SEE must have authorized accounts with dedicated passwords.</p> <p>MGS employees who have access to the application and hold positions for which they require access to applicant data (i.e., Help Desk) are required to sign a non-disclosure agreement.</p>

8.2 Does the project/system employ the use of automated privacy controls or enhanced capabilities designed to support privacy? Explain.

To mitigate privacy risks to PII and reduce the potential for data breaches or intrusions, FT-SEE has built-in automated controls, such as system lock-out after three failed attempts to log in, use of a PIN to modify sensitive PII within the system, and automatically logging off the user after 60 minutes of inactivity. HCMO administrators can only access the system if they are connected to the FTC network or have remotely logged into the FTC network.

8.3 Has a Privacy Act System of Records Notice (SORN) been published in the Federal Register for this system/project? If so, list the applicable SORN(s).

Yes. Applicant information maintained in FT-SEE is covered by the following Privacy Act SORNs: [OPM GOVT-1, General Personnel Records](#); [OPM GOVT-5, Recruiting, Examining, and Placement Records](#); [FTC II-1, General Personnel Records](#); [FTC-II-4, Employment Application-Related Records](#).

8.4 How does the project/system ensure that the information is collected, used, stored, or disseminated in accordance with stated practices in this PIA?

Annual audits, both internal and external, are conducted on the records maintained and technical controls in place. The internal audit is conducted by the FTC HCMO Information Systems team. External audits are conducted by OPM and MGS. The results of the FTC and OPM audits are provided to the FTC Chief Human Capital Officer and applicable HCMO staff for review and corrective action, if any. Audit results conducted by MGS are provided upon request by FTC. The policies surrounding the safeguarding of information within FT-SEE align with FTC's existing privacy policies and procedures.

9 Approval and Signature Page

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