



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Federal Trade Staffing and Employment Express (FT-SEE)
Privacy Impact Assessment

August 2007

Introduction

The Federal Trade Commission's (FTC) Human Resources Management Office (HRMO) is responsible for recruiting employees for the FTC. To maximize the efficiency of the recruitment and staffing process, HRMO has implemented an automated recruitment and staffing system, Federal Trade Staffing and Employment Express (FT-SEE). FT-SEE enables the electronic submission and evaluation of applications for positions at the FTC. FT-SEE attracts qualified and talented job seekers, while simplifying the application process for applicants and evaluators. Prior to the implementation of FT-SEE, most functions were performed manually, which was time-consuming, cumbersome, and inefficient. FT-SEE contributes to the FTC's mission by allowing staff to recruit, evaluate, and hire the best qualified applicants while minimizing the time and resources devoted to this task.

System Overview

FT-SEE is hosted through a commercial application from Monster Government Solutions (MGS) called QuickHire Xi (also known as 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 Web site for employment information, www.usajobs.opm.gov, can use that Web site's search function to locate listings for current FTC vacancies. The FTC vacancy listings posted on that Web site contain summaries of each position. FT-SEE simplifies the recruiting and application process by enabling applicants to submit their applications online upon viewing these summaries. By clicking "Apply Online" within the summaries, applicants are forwarded to the FT-SEE Web site. This Web site is operated and hosted for the FTC by MGS, using MGS's secure private servers. Within the FT-SEE Web site, applicants are asked to submit a resume and other personal information, as well as respond to a series of questions specifically designed for each vacant position, in order to complete the online application. The FT-SEE Web site allows applicants to view the status of their applications once submitted.

Following the applicant's submission of the online application, FT-SEE allows HRMO staff to view the application electronically for assessment. During the assessment of applications, HRMO determines which individuals are qualified for positions. HRMO then refers said applicants to the selecting officials for these positions. Selecting officials are then granted access to the referred applicants' application information through FT-SEE. As described below, these officials are only granted access to the information of individuals who have applied to the specific vacancy for which they are the selecting officials. This access is also only granted on a temporary read-only basis, terminating upon selection. Selecting officials, after reviewing candidates and applications, indicate through FT-SEE which applicants will receive offers. HRMO then uses the information in FT-SEE to notify applicants, whether by FT-SEE generated emails or letters, or by contact information contained in the FT-SEE system.

Analysis

1. The Information That Will Be Collected (Nature and Source)

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

FT-SEE requires the collection of personal data from applicants to generate an applicant profile. An applicant can use this profile to apply for any vacancies through FT-SEE. This information is provided through online forms by the applicant. Personal data collected from applicants may include: name (first, middle initial, last), date of birth, Social Security Number (SSN), address, phone number, email address, citizenship, military service, veterans preference, resume, answers to questions specific to the individual position, notification preferences, and secret question and answer (for password to the Web site). Individuals may edit their personal information, as long as they maintain their QuickHire ID (the ID for their individual account), the registration email associated with their account, and the password to access their FT-SEE account. HRMO staff can also access and provide applicants with the data when applicants provide proper verification of identity.

FT-SEE also collects information for each job vacancy for which an applicant applies. In situations where two announcements are posted for a position, one for Merit Promotion and one for Delegated Examining, and the applicant is eligible to apply for and applies for both, the system would record these applications separately. This information is provided by the applicant to FT-SEE through online forms. Information provided by the applicant for each job vacancy may include: applicant name, grade/band, veterans preference, other personal data, resume, additional required documentation, and responses to core questions.

FT-SEE also maintains information generated by HRMO for each job vacancy for which an applicant applies. This information is used in the assessment of applications. This information may include: vacancy data, additional required documentation, qualification determination (qualified or not qualified), numerical score, applicant rating (e.g., best qualified, qualified, etc.), whether the applicant was referred to the selecting official and, if the candidate was referred, whether they were selected.

FT-SEE also collects applicant demographic information. As required by Federal law, HRMO is required to collect applicant demographic information (e.g., ethnicity, race, disability, if any, etc.) to determine if recruitment efforts are reaching all segments of the country. This information is collected directly from applicants via online forms, and submission of it is voluntary and has no effect on the applicant's consideration. This information, after collection, is used only for statistical purposes and not associated with any individual.

2. Why The Information Is Being Collected (Purpose)

The information is being collected to support the hiring of capable and qualified candidates for posted 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. Collection of the SSN is required by both HRMO and the Office of Personnel Management (OPM) as a unique identifier for applicants. Demographic information, collected as required by Federal law, is used only in the aggregate and is thus not associated with any individual.

3. The Opportunities Individuals Will Have To Decline To Provide Information Or To Consent To Particular Uses Of The Information And How Individuals Grant Consent

Applying for vacant positions at the FTC is optional and at the complete discretion of the applicant. To receive full consideration for a vacancy, applicants must apply and provide the information required by FT-SEE. In providing the information required by FT-SEE, the applicant must complete a registration process requiring: the submission of the applicant's SSN and date of birth, completion of responses to questions related to the qualifications and experience of the applicant, and the submission of a resume. Applicants may limit the amount of personal information provided in the resume and responses to questions, but failure to provide complete information may affect the assessment of the applicant. Further, in registering to use the FT-SEE Web site, the applicant is given the choice, via notification preferences, to consent to or decline the use of their contact information to receive future email notifications about relevant job postings.

Submission of demographic information is voluntary, and applicants may apply and receive consideration for FTC vacancies without providing that information.

4. Intended Uses Of The Information Collected

The FTC's HRMO staff uses the information collected to determine if an applicant meets minimum qualifications and eligibility requirements for the vacant position. As described earlier (see Section 2 regarding Purpose above), data collected in the system is used by selecting officials and other FTC staff involved in the review and assessment of applicants. For example, the system is used to store contact information for applicants centrally, track applicant scores for selective factors for vacancy announcements, generate emails to job applicants, and generate reports on applications received for each vacancy announcement. Demographic data, as described earlier, is used only for statistical reporting purposes.

5. With Whom The Information Will Be Shared (Disclosures)

Within the FTC, access to the FT-SEE system is limited to only to those FTC or contractor personnel directly involved in the recruitment cycle (e.g., Human Resources specialists, selecting officials) or in data administration (e.g., system administrators).

The information may be provided to other Federal agencies when the FTC is legally obligated to do so. As an example, applicant information may be disclosed to OPM for audit purposes, for other purposes authorized as a routine use under the Privacy Act (see Section 7 below), or if otherwise required by law (e.g., official Congressional or GAO request). In addition, the fact that the individual has applied for employment with the FTC, and other identifying information, may be disclosed in conducting credit or background checks with third parties (e.g., credit bureaus, past employers, personal references, etc.).

MGS states that any companies or individuals employed by MGS may, in the course of performance of functions on MGS's behalf, have access to system data maintained on behalf of MGS customers (e.g., the FTC), but that these companies or individuals are prohibited from sharing such data with any other party.

6. Security (Administrative and Technological Controls, Including Maintenance and Disposal)

Reasonable and appropriate safeguards are in place to protect information collected through FT-SEE.

Public access to the FT-SEE system by applicants is for the limited purposes of registering on the Web site, submitting their personal data, viewing vacancy announcements, applying for jobs online, checking the status of their application, accessing and changing their personal profile information and/or password, and setting their email notification preferences. Applicants can review no other person's information but their own. Applicants enter information through a secure Web page and their data are stored on secure servers. (Although MGS operates and hosts the Web site, the FTC, not MGS, holds the rights to the data.) The Web site authenticates applicants' access to the Web site through an email address and password (minimum 5 characters) provided by the applicant. In the event the user has forgotten their password and seeks to access their FT-SEE account, the system asks the user a secret question and compares the user's response against the user's answer. Provided these match, the system sends a password to the user at the email account on file.

All other access to the FT-SEE system (e.g., to post or revise online job postings, review applicant data or non-identifiable demographic data) is authorized only to those FTC users and contractor personnel directly involved in the recruitment cycle (e.g., Human Resources specialists, selecting officials) and/or in data administration (e.g., data managers at MGS, relevant FTC information technology staff). HRMO staff users have two sets of passwords, one for the system and one for the database. Passwords expire after a set period, accounts are locked after a set period of inactivity, passwords must be at least 8 characters and a strong combination of uppercase, lowercase and special characters, and accounts are locked after a set number of incorrect attempts. (Similar controls apply to the system manager passwords.) Selecting officials have only temporary access to the specific data for applicants that they are responsible for reviewing (i.e., no access to any other applicant data) and have read-only access. The selecting officials' passwords expire when the job case is closed by HRMO. MGS tests the robustness of administrator and employee passwords using certain open source or freeware

applications. Both server and application logs are reviewed weekly (or sooner if needed) to monitor access and behavior, as discussed further below.

Data are transmitted over the Internet using a standard web browser, and those data are encrypted both at rest and during transmission. MGS has agreed to ensure the appropriate and secure storage of any cryptographic keys used by QuickHire and related systems. In addition, to comply with OPM guidance (June 18, 2007) for the protection of SSNs, MGS is in the process of a system change to use asterisks or other character technology to mask SSNs as they are being typed by the applicant during submission to the FT-SEE Web site.

Applicable IT security requirements and procedures required by Federal law and policy are followed to ensure that information is appropriately secured. MGS has conducted an appropriate risk assessment to identify appropriate security controls to protect against risks, and has implemented those controls. 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. MGS adheres to the following review schedule:

- Network Mapping - annually
- Vulnerability Scanning - monthly
- Security Test and Evaluation - every 3 years, or upon major changes to system
- Password Cracking - annually
- Log Review - weekly (e.g., to check for anomalies possibly indicating hacking attempts)
- File Integrity Checkers - monthly
- Virus Detection - daily
- Penetration Testing - annually; incorporates several types of testing:
 - Internet Application Testing - employs friendly hacking techniques to find flaws in applications from the Internet; involves attempted spoofing and trusted hosts
 - Router Testing - ensures that only traffic expressly permitted into the network is allowed and all else denied
 - Firewall Testing - tests the firewall response to all types of traffic
 - Intrusion Detection System Testing - tests configured reactions to several attacks
 - Denial of Service Testing - investigates vulnerabilities that may lead to denial of service attacks against MGS Web site and applications
 - Social Engineering - attempts to compromise MGS through information gathered from employees
 - Document Grinding and Intelligence Scouting - investigates MGS key personnel; researches information from the Internet that can be analyzed as business intelligence

The FTC's Chief Information Security Officer is the point of contact for any security questions related to this project.

Under applicable Federal records retention and destruction requirements and agency policy, the FTC maintains merit promotion case files containing application data for two years after the closing of each case. MGS has also represented that it disposes of system data, hardware and software using appropriate and secure methods. This includes media sanitization, or removal of

information from a storage medium, to make data unrecoverable through normal system operations. Purging renders data unrecoverable through laboratory efforts such as overwriting, degaussing, and destruction.

7. Privacy Act

The applicant information maintained in FT-SEE is covered by existing Privacy Act System of Records Notices. *See* Recruiting, Examining, and Placement Records, OPM/GOVT-5, 71 FR 35341, 35351 (June 19, 2006), http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=2006_register&docid=fr19jn06-117;¹ *see also* FTC II-1, General Personnel Records, 57 FR 45678 (Oct. 2, 1992), <http://www.ftc.gov/foia/listofpaysystems.shtm>.

All FTC vacancy announcements currently provide the required Privacy Act statement under the additional information section, which is available to the user for review before filling out the online application form. In addition, in compliance with section 208 of the EGOV Act, a hyperlink to the FTC's privacy policy has recently been posted to the FTC-SEE Web site.

8. Other Privacy Considerations And Analysis

The FTC has identified privacy risks associated with FT-SEE and has taken steps to mitigate those risks. The potential risk of applicants accessing the information of other applicants has been minimized by requiring all applicants to register and access the system with a unique user ID and password, as explained earlier. In addition, a statement is displayed upon registration indicating that attempting to violate the privacy of others may be punishable by fine or imprisonment.

Procedures have been implemented to minimize the potential risk of inappropriate or unauthorized disclosure of applicant information. A unique user ID and password is assigned to each HRMO staff member who has access to FT-SEE. Only those staff members with a need to know for official agency business are provided with user IDs. Selecting officials are assigned a user ID and password unique to each vacancy announcement, so they cannot review applicant information for any other position, as explained above. In addition, all contractors who have access to the application are required to sign a non-disclosure agreement.

The system utilizes session (temporary) cookies in order to maintain and manage user information during user progression through the registration process and online application, and does not use any persistent (permanent) cookies. Sessions are timed out after 60 minutes of inactivity.

¹ The FTC notes that OPM does not consider Merit Promotion Plan records to be covered by the Privacy Act, where such records are filed and maintained by vacancy announcement number or key other than a personal identifier.

Because the system, by its nature, is designed to collect job application information from those qualified for Federal employment, and children under the age of 13 are ineligible to apply, the FT-SEE Web site is not directed to such children nor to the FTC's knowledge does the Web site otherwise collect children's personal information subject to the requirements of the Children's Online Privacy Protection Act (COPPA).

Prepared for the Business Owners of the System by:

_____ Date:
Karen Leydon
Director, Human Resources Management Office

Review:

_____ Date:
Alexander C. Tang, Attorney
Office of the General Counsel

_____ Date:
Marc Groman
Chief Privacy Officer

_____ Date:
Margaret Mech
Chief Information Security Officer

Approved:

_____ Date:
Stanley Lowe
Acting Chief Information Officer