

# Human Oversight & Candidate Recourse Procedure

Defines meaningful human supervision, override authority, accommodation and alternative processes, candidate challenge, and documented reconsideration for high-risk hiring AI.

## SIMULATED OPERATING DOCUMENT

Prepared for a fictional employer using synthetic systems and synthetic applicant data. This document is a governance demonstration, not legal advice.

## SHOWCASE ARTIFACT

This procedure answers the operational question: what actually happens when the system would screen someone out?

### 1. Core rule

EMP-AI-01 may recommend or prioritize; it may not make a final rejection decision. A recruiter is accountable for the decision to advance or not advance a candidate and must use the approved job rubric rather than the AI score as the reason for the decision.

### 2. Human oversight workflow

| Step                           | Required action                                                                                                                                        | Record created                                                   | Escalation trigger                                                   |
|--------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------|----------------------------------------------------------------------|
| 1. Score generated             | AI produces score and evidence tags; score is not communicated as a final decision.                                                                    | Model version, timestamp, inputs used, score.                    | Missing explanation tag or model/version mismatch.                   |
| 2. Structured review           | Recruiter reviews minimum qualifications and approved job criteria.                                                                                    | Rubric ratings + evidence notes.                                 | AI result conflicts with obvious résumé evidence.                    |
| 3. Screen-out review           | Every proposed screen-out below threshold receives a human check; high-risk pilot uses second review for a defined sample and all accommodation cases. | Advance / do not advance decision + reason code.                 | No job-related reason can be documented.                             |
| 4. Override                    | Recruiter may override AI recommendation in either direction only using job-related reason codes.                                                      | Override flag, rationale, reviewer.                              | Override rate > threshold or manager pressure to follow score.       |
| 5. Accommodation / alternative | If candidate indicates disability-related difficulty, route to accommodation team and pause AI-based decision as needed.                               | Accommodation case stored separately from scoring data.          | Vendor fails to forward request; alternative assessment unavailable. |
| 6. Candidate reconsideration   | Candidate may request human review of an AI-influenced screen-out.                                                                                     | Request, acknowledgment, reviewer, evidence considered, outcome. | Pattern of similar complaints / protected-group issue.               |
| 7. Finalize                    | Second reviewer confirms reconsideration outcome for contested high-risk cases.                                                                        | Final disposition and communication.                             | Potential discrimination, data error, systemic issue.                |

Authority notes: R3, R5.

### 3. Reviewer qualifications and limits

- Complete annual EEO, disability accommodation, AI literacy, and tool-specific training.
- Understand the job rubric and which model features are permitted or restricted.
- Have authority to disregard the AI recommendation without penalty.
- Do not see protected-class audit fields during candidate decision review.
- Do not create local thresholds, shortcut rules, or “always follow the score” practices.
- Record a job-related reason independent of the AI score for every non-advance decision.

## 4. No-automation thresholds

| Condition                                               | Required response                                                               |
|---------------------------------------------------------|---------------------------------------------------------------------------------|
| Accommodation request or credible accessibility concern | Pause affected automated assessment; provide accessible or alternative process. |
| Parser confidence below approved threshold              | Human review source résumé; correct extracted data before any decision.         |
| Candidate data conflict / suspected error               | Do not rely on score until corrected.                                           |
| Model version not approved                              | Stop use; route to AI Governance / Security.                                    |
| Adverse-impact monitoring trigger                       | Pause new automated screen-outs for affected use case pending review.           |
| Discrimination or serious rights complaint              | Legal / HR escalation; preserve records; consider system suspension.            |

## 5. Recourse service levels (internal policy)

| Event                                          | Target SLA                                                                  |
|------------------------------------------------|-----------------------------------------------------------------------------|
| Candidate question about AI use                | Acknowledge within 2 business days                                          |
| Accommodation request                          | Route same business day; engage promptly under accommodation process        |
| Human reconsideration request                  | Acknowledge within 2 business days; decision target within 10 business days |
| Data-correction request affecting ranking      | Freeze affected decision where feasible; review within 5 business days      |
| Systemic complaint / discrimination allegation | Escalate to Legal and AI Governance within 1 business day                   |

## Annex A - Candidate-facing Employment AI Notice

### EMPLOYMENT AI NOTICE - SAMPLE

HarborPoint Services uses an AI-enabled résumé-ranking tool at the application-screening stage for certain roles. The tool helps prioritize applications for recruiter review. It does not make the final hiring decision.

- What it assesses: job-related skills, relevant experience, required certifications, and other qualifications defined for the role. The approved configuration does not use race, ethnicity, sex, disability information, age, religion, photos, ZIP code, graduation year, or inferred personality/emotion as ranking inputs.
- Data used: information you provide in your résumé and application, plus the employer's job requirements. Application records and the AI-generated score are retained for 24 months after the hiring decision in this simulated policy, unless a longer period is required by law or legal hold.
- Alternative process and disability accommodation: if a disability or the format of an automated assessment may affect your ability to participate or be assessed accurately, you may request a reasonable accommodation or an alternative process. Requesting an accommodation will not be used as a ranking factor.
- Questions or human review: you may ask how AI was used in your application or request human reconsideration of an AI-influenced screening outcome. A recruiter will review the job-related evidence and document the result.
- For covered New York City positions, additional advance notice and bias-audit information will be provided as required.

Authority notes: R3, R6.

## Annex B - Internal AI disclosure procedure

1. At requisition creation, determine whether an AI-enabled tool will assess a candidate for hiring or promotion and identify each applicable jurisdiction.

2. For covered NYC AEDT use, confirm an independent bias audit is current within the required period, the public summary is posted, and the candidate notice is provided at least 10 business days before AEDT use.
3. Notice must identify that an AEDT is used, the job qualifications/characteristics assessed, and instructions for requesting a reasonable accommodation; use the approved delivery channel and retain evidence of publication/delivery.
4. For all high-risk uses, provide the organization's broader Employment AI Notice even where a specific law does not mandate the same content.
5. Version-control all notices. A material change to assessed characteristics, data sources, retention, or model role requires notice review before use.
6. Recruiting Operations retains evidence of notice timing, version, job requisition, tool/version, and applicable audit summary link or record.

Authority notes: R6.

## Annex C - Candidate reconsideration case record

| Field                           | Required record                                                                           |
|---------------------------------|-------------------------------------------------------------------------------------------|
| Case ID / job requisition       | Unique case identifier, role, location, hiring stage                                      |
| AI system / version             | Tool ID, model/version, score/rank, date used                                             |
| Candidate request               | Question, accommodation, data-correction, or reconsideration request; received date       |
| Original decision basis         | Recruiter rubric, reason code, evidence used; AI score is not accepted as sole reason     |
| Human reviewer                  | Reviewer name/role, independence from original decision where required                    |
| Data correction / accommodation | Any corrected résumé parsing, accessible format, alternative assessment, or excluded data |
| Reconsideration outcome         | Advance / no advance / reassess; job-related rationale                                    |
| Timing                          | Acknowledgment date, decision date, SLA status                                            |
| Escalation                      | Legal / HR / Governance referral and incident link if applicable                          |
| Communication                   | Date and version of candidate response                                                    |