Model Card for gridChallenge Cognitive Assessment

This model card is intended to be a non-exhaustive summary of some key aspects of Aon's cognitive assessment gridChallenge. It was created by individuals at the American Civil Liberties Union (ACLU) using publicly available information. For more detail, see <u>ACLU Complaint to the FTC Regarding Aon Consulting, Inc</u>. Last updated October 3, 2024.

Tool Design Details: gridChallenge is a working memory assessment developed by Aon Consulting, Inc. and designed to be used in pre-employment testing contexts [See 1, pg. 2].

- Tool Name and Version Number: gridChallenge, Version 3.0 (12/22/2022)
- Type of tool: Cognitive assessment focused on working memory
- Vendor name: Aon Consulting, Inc.
- **Tool format:** gridChallenge is a "gamified" assessment, where tasks are presented as "fast-paced 'mini games'" [See 1, pg. 15].
- Short summary of development process: gridChallenge was developed based on an existing Aon working memory assessment called GAME [See 1, pg. 23].

Tool Deployment Details. gridChallenge is used early in hiring processes and may be used with other selection tools as part of a battery of assessments.

- Stage of the hiring process tool is used: Aon has stated that the tool is "appropriate for use early in the recruitment process, to screen out applicants prior to more resource-intensive hurdles (e.g., resume screening, interviews, etc.)" [See 1, pg. 3].
- Tool administration: gridChallenge includes memorizing the location and order of highlighted circles or arrows in a short amount of time. The test also includes "distractor tasks" such as assessing whether a pattern is symmetrical [See 1, pg. 24, 27].
- Interpretation of tool outputs: For gridChallenge, possible scores range from 0 to 100, where higher scores indicate better performance [See 1, pg. 28]. Aon indicates in online materials that cut-off scores are often used with ability assessments like gridChallenge [See 2].
- Use with other tools: Aon's materials indicate that multiple ability tests like gridChallenge are often used together as part of the same hiring process [See 3]. In the matter for which the ACLU filed EEOC charges, an employer used gridChallenge with Aon's adaptive personality assessment, ADEPT-15.
- Employers known to be using the tool: Unknown. The employer against whom ACLU filed EEOC charges (which we have not publicly named) is a mid-sized employer based in the US.

Tool Evaluation Details. Publicly available technical documentation and research indicates that gridChallenge has disparities on the basis of race and may also unfairly screen people out based on disability.

- Summary of the validation process. Publicly available technical documentation describes the validation process for gridChallenge [See 1]. It is unknown whether employers using gridChallenge conduct or have conducted separate validation processes for the tool.
- Summary of adverse impact analyses. Publicly available technical documentation for gridChallenge demonstrates disparities in average scores for assessment-takers of different races. In a study of gridChallenge, Aon reported that non-white assessment takers all scored lower than white assessment-takers on average, and the largest disparity was for Black or African American test-takers. [See 1, pg. 57]. It is unknown whether Aon or employers using gridChallenge have otherwise analyzed gridChallenge regarding potential adverse impact, including with a focus on disability or intersectional impacts of the tool.
- Claims or guarantees regarding bias or fairness. Aon claims that its assessments are "fair" and "have no adverse impact" [See <u>ACLU Complaint to the FTC Regarding Aon Consulting, Inc.</u>, pg. 5-8].

Model Card for Adaptive Employee Personality Test (ADEPT-15)

This model card is intended to be a non-exhaustive summary of some key aspects of Aon's ADEPT-15 personality assessment. It was created by individuals at the American Civil Liberties Union (ACLU) using information that was previously publicly available. For more detail, see <u>ACLU Complaint to the FTC Regarding Aon Consulting, Inc.</u> Last updated October 3, 2024.

Tool Design Details: ADEPT-15 is an algorithmic personality assessment designed by Aon Consulting, Inc.

- Tool Name and Version Number: ADEPT-15 Version 7.1 (2022/11/11)
- Type of tool: Personality assessment administered as a computer adaptive test (CAT)
- Vendor name: Aon Consulting, Inc.
- Information about the tool's underlying form: ADEPT-15 is a computer adaptive test that presents test-takers with a series of statement pairs (statements like "I work well with other people" or "People who know me best say I am level-headed") and asks applicants to select which of the statements they agree with and how strongly they agree with them. As the test progresses, adaptive algorithms are used to determine which statements assessment-takers are shown based on their previous responses. ADEPT-15 purports to measure 15 constructs of personality—constructs like what Aon terms "Awareness," "Positivity," "Liveliness," "Sensitivity," or "Drive"—to predict future job performance. [See 1, pg. 16].

Tool Deployment Details. ADEPT-15 is used by employers at various stages of the hiring or employment process and may be used with other selection tools as part of a battery of assessments.

- Employment process for which the tool is used: Aon states that ADEPT-15 can be used as a screening assessment, among other applications, and that ADEPT-15 can be broadly applicable across industries and "all functions and roles and at all levels in an organization" [See 1, pg. 16-17].
- Tool administration: Assessment-takers take the assessment on a web-connected electronic device and the process is estimated to take approximately 25-30 minutes [See 2].
- Interpretation of tool outputs: ADEPT-15 can produce scores for candidates for each of 15 "personality aspects" or may be configured by an employer to focus on a limited set of aspects. Aon's materials indicate that these scores may be presented to and interpreted by employers in various ways [See 1, pg. 20].
- Use with other tools: Aon materials indicate that its reports can aggregate candidates' scores on multiple assessments, including personality assessments, and

¹ This model card was created using information from Aon's Technical Documentation for ADEPT-15 Version 7.1, which was previously publicly available and referenced in the ACLU Complaint to the FTC Regarding Aon Consulting, Inc. Since this documentation is no longer publicly available to our knowledge, in this model card we reference information from the Technical Documentation using citations to the ACLU's FTC Complaint.

- that these aggregate scores can be used to rank or sort candidates [See $\underline{3}$]. In the matter for which ACLU filed EEOC charges, an employer used ADEPT-15 with Aon's cognitive assessment, gridChallenge.
- Employers known to be using the tool: Unknown. The employer against whom ACLU filed EEOC charges (which we have not publicly named) is a mid-sized employer headquartered in the US.

Tool Evaluation Details. Previously publicly available technical documentation and research indicates that ADEPT-15 carries a high risk of discriminating against autistic people or otherwise neurodivergent people and people with mental health disabilities.

- Short summary of the validation process. Technical documentation describes the validation process for ADEPT-15. It is unknown whether employers using ADEPT-15 conduct or have conducted separate validation processes for the tool. The personality constructs that ADEPT-15 uses are closely tied to characteristics commonly associated with autism and mental health diagnoses, and numerous studies have found that people with disabilities tend to score on the extreme ends of these constructs. This technical documentation gives no indication that Aon took measures that experts in industrial and organizational psychology have prescribed to begin to address discrimination in the use of personality assessments for autistic people, otherwise neurodivergent people, or people with mental health disabilities [See 1, pg. 21-29].
- Summary of adverse impact analyses. Technical documentation describes Aon's analyses of potential adverse impact related to ADEPT-15. While it is unknown whether Aon or employers using ADEPT-15 have otherwise analyzed ADEPT-15 regarding potential adverse impact, including with a focus on disability or intersectional impacts of the tool, ADEPT-15 may test for characteristics that are close proxies for a range of mental health disabilities [See 1, pg. 28].
- Claims or guarantees regarding bias or fairness. Aon claims that its assessments are "bias-free," "fair," have "no adverse impact," and "increase diversity." Aon also claims that ADEPT-15 was "developed from the ground up" for "minimal" demographic differences based on disability [See 1, pg. 1-2].

Model Card for vidAssess-Al Video Interviewing Tool

This model card is intended to be a non-exhaustive summary of some key aspects of Aon's vidAssess-AI video interviewing tool. It was created using publicly available information by individuals at the American Civil Liberties Union (ACLU). For more detail, see <u>ACLU Complaint to the FTC Regarding Aon Consulting, Inc</u>. Last updated October 3, 2024.

Tool Design Details: vidAssess-Al is a video interviewing tool designed by Aon Consulting, Inc.

- Tool Name and Version Number: vidAssess-AI (Version Number Unknown)
- Type of tool: Asynchronous video-interviewing tool with artificial intelligence (AI) analysis functionality
- Vendor name: Aon Consulting, Inc.
- Information about the tool's underlying form: vidAssess-Al relies on ADEPT-15 for its personality model [See 1, pg. 15]. Aon links particular questions posed to candidates to specific ADEPT-15 personality constructs, and vidAssess-Al scores candidates' responses by associating elements of the content of candidates' spoken responses, such as use of particular words or phrases, with those constructs [See 1, pg. 89-97]. As described by Aon, the processing and scoring of candidates' video responses by vidAssess-Al proceeds in two general steps: the tool "converts video responses from speech to text and then applies a natural language processing ["NLP"] artificial intelligence for scoring results" [See 2].

Tool Deployment Details. vidAssess-Al is used by employers in the interview process.

- Stage of the hiring process tool is used: Aon states that vidAssess-AI can be used at the interview stage.
- Tool administration: vidAssess-AI allows employers to administer interviews asynchronously—candidates record video responses to selected interview questions—and the interviews can be analyzed and scored using AI [See 3].
- Interpretation of tool outputs: vidAssess-AI scores can be reported back to employers in a variety of formats [See 1, pg. 96-97].
- Employers known to be using the tool: Unknown.

Tool Evaluation Details. vidAssess-Al's reliance on ADEPT-15 and independent research indicate that vidAssess-Al has a high risk of discrimination on the basis of disability, race, and other protected characteristics.

- Validation process and adverse impact analyses. To our knowledge, validation and
 adverse impact analyses are not publicly available for vidAssess-AI. However, through its
 reliance on ADEPT-15, vidAssess-AI replicates the discrimination inherent in ADEPT-15,
 and through its use of AI and machine learning (ML) for converting speech to text and
 analyzing text in line with purported personality constructs, vidAssess-AI risks
 exacerbating this discrimination. Independent research has established that these types
 of AI and ML systems perform worse for <u>Black speakers compared to white speakers</u>, for
 speakers <u>whose first language is not English</u>, and for speakers <u>with speech disabilities</u>
 and other disabilities.
- Claims or guarantees regarding bias or fairness. Aon markets vidAssess-AI as "fair" and "minimiz[ing] human bias" [See 4, pg. 14]