

TIAA NEW YORK CITY LOCAL LAW 144 BIAS AUDIT RESULTS – WORKDAY SPOTLIGHT TOOL

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I. Introduction

New York City's Local Law 144 ("Local Law 144") obligates New York City-based employers, like TIAA, to hire a third-party independent entity to conduct an annual bias audit of automated employment decision tools or "AEDTs"¹. Prior to TIAA's use of Workday's HiredScore AI Spotlight candidate matching technology (the "Spotlight Tool") beginning on January 28, 2026, TIAA engaged an independent, outside entity, DLA Piper, to conduct an audit of the Spotlight Tool.² The Spotlight Tool matches information that candidates submit in connection with their job application to the skills and requirements identified in the job requisition, highlighting for recruiters the degree to which the candidate's qualifications match with the job requirements. More information on the Spotlight Tool can be found on Workday's website. As used in this report, TIAA refers to Teachers Insurance and Annuity Association of America and its subsidiaries and affiliates, including but not limited to Nuveen Services, LLC.

New York City Local Law 144 requires an annual Bias Audit to calculate the following for each Enumerated Category³:

1. Selection Rate; and
2. Impact Ratio.

The Selection Rate is defined as the rate at which individuals in each Enumerated Category are either selected to move forward in the hiring process or assigned a classification. The Impact Ratio is defined as the selection rate for each Enumerated Category divided by the selection rate of the most selected Category.

Upon completion of this Bias Audit, there were no impact ratios below the standard threshold of .80.

II. Selection Rate and Impact Ratio Analyses

Workday provided application data spanning the period from June 2024 to May 2025, consists of gender and race information and the binary outcome from the tool indicating whether the application was flagged as priority or not (e.g., candidates received an "A" or "B" vs those that received either a "C" or a "D") for each application.

¹ AEDTs are defined in Local Law 144 as "any computational process, derived from machine learning, statistical modeling, data analytics, or artificial intelligence, that issues simplified output, including a score, classification, or recommendation, that is used to substantially assist or replace discretionary decision-making for making employment decisions that impact natural persons." Importantly, this memorandum does not take the position that Workday's AI qualifies as an AEDT under this law.

² TIAA has not determined, and it is not clear or certain, that TIAA's use of the Spotlight Tool qualifies it as an AEDT under Local Law 144. By retaining an independent third party to conduct this Bias Audit, TIAA does not waive its right to assert that Local Law 144 does not apply to its usage of the Spotlight Tool and that TIAA is under no obligation to conduct a Bias Audit under the law. TIAA has nevertheless conducted this Bias Audit out of an abundance of caution and the desire to ensure that any technology used in recruiting and talent selection does not exhibit indications of unintended bias.

³ The categories required by Local Law 144 are: Race (i.e., Hispanic or Latino, White, Black or African American, Native Hawaiian or Pacific Islander, Asian, Native American or Alaska Native, and Two or More Races); Gender (categorized as male or female); and the intersection of Race and Gender.

Table 1: Impact Ratios and Selection Rates for Workday Data

Population	All Applications Count	All Priority Applications Count	Selection Rate (rounded to 3 digits)	Impact Ratio (rounded to 3 digits)
Gender				
Male	827,795	545,041	0.658	1
Female	572,744	360,559	0.630	0.956
Unknown	48,891	31,450	0.643	0.977
Race				
White	534,753	349,805	0.654	0.994
Asian	419,147	264,550	0.631	0.959
Black or African American	202,647	133,360	0.658	1
Unknown	125,678	80,035	0.637	0.968
Hispanic or Latino	116,011	75,945	0.655	0.995
Two or more races	51,194	33,355	0.652	0.99
Gender and Race				
Male, White	317,049	211,853	0.668	1
Male, Asian	237,705	152,564	0.642	0.961
Female, White	208,766	132,041	0.632	0.947
Female, Asian	173,013	106,555	0.616	0.922
Male, Black or African American	110,588	73,463	0.664	0.994
Female, Black or African American	87,905	57,199	0.651	0.974
Male, Hispanic or Latino	73,329	48,995	0.668	1
Male, Unknown	58,298	37,850	0.649	0.972
Female, Unknown	43,391	26,933	0.621	0.929
Female, Hispanic or Latino	40,676	25,682	0.631	0.945
Male, Two or more races	30,826	20,316	0.659	0.986