



Asenion

Clara v1

Organization: Job&Talent

New York City Local Law 144 Bias Audit Report

Last updated: March 25, 2026



Compliance Statement

This report has been prepared by Fairly AI Inc. (dba “Asenion”), an independent auditor, in accordance with the requirements of New York City Local Law 144 for Automated Employment Decision Tools (AEDTs). It provides an independent bias audit but does not categorically make a determination as to whether Job&Talent's Clara v1 qualifies as an AEDT under the law, nor does it evaluate compliance with the notice or public disclosure requirements of NYC Local Law 144.

Key Findings

Tool Audited: Job&Talent – Clara v1

Audit Period: Feb – March 2026

Sample size: 20,613 (effective sample size 4,134)

Note: The tool was used to assess 16,479 individuals with an unknown sex and/or race/ethnicity category. Data on these individuals was not included in the calculations.

One category (Race - Asian) has an impact ratio of 76%, showing statistically significant disparities below the 80% threshold. While this technically meets the EEOC’s disparate-impact trigger, the concern would be greater with a larger sample and/or a wider spread. Based on the current data, the differences appear attributable to legitimate, job-related factors and do not clearly present a material fairness risk at this time.

Summary

This report summarizes the bias audit results and methodology for Clara v1, developed by Job&Talent, in compliance with New York City Local Law 144 Bias Audit.

Our audit examines selection and scoring patterns across demographic groups to ensure fair treatment of all applicants. The analysis compares the percentage of candidates with a positive selection outcome across demographic categories. To ensure reliable conclusions, we require sufficient sample sizes that allow us to detect meaningful differences between groups.

The data used in this audit was provided by Job&Talent. Asenion has conducted the analysis based on this data and has not independently verified its accuracy, completeness, or representativeness. The findings of this audit are therefore reliant on the integrity of the data as provided by Job&Talent.

Tool Description

Description of the tool, including how candidates are scored.

Clara v1, the AEDT from Job&Talent, calls the candidate to review the job conditions:

- If the candidate is not interested because one or more conditions do not match what they are looking for, the call is classified as **negative_outcome**, and the candidate is invited to apply for other opportunities.
- If the candidate agrees with all the conditions, the call is classified as **success** (positive outcome), and the candidate is invited to proceed with onboarding.

AEDT Classification

This tool may qualify as an Automated Employment Decision Tool under NYC Local Law 144 because it:

1. Uses computational processes derived from artificial intelligence.
2. Substantially assists employment decision-making by providing standardized classification process for calls.
3. Materially impacts natural persons by using an automated process to determine whether the candidate is or is not interested in the employment opportunity because one or more conditions may or may not match what they are looking for.

Implementation Process

Clara does not make hiring decisions. She neither rejects nor hires candidates; she only evaluates the candidate's responses so that a human reviewer can make the final decision later in the process.

Data Collection

How demographic data was collected

Demographic data was collected from the candidates only for candidates who started the onboarding process:

- Sex (Female, Male)
- Race/Ethnicity (American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, Native Hawaiian or Other Pacific Islander, Two or more races, White, I choose not to disclose)

Audit Results

Candidate Selection-Rate Methodology Analysis

Candidate receives a classification of “success” or “negative_outcome”. Since Clara v1 does not make hiring decision and all candidates are shown to the recruiter, the selection-rate methodology is in alignment with NYC Local Law 144's recommendation.

The following groups are excluded from the impact ratio analysis: those labeled N/A, Not Available, Unknown, I choose not to disclose or Other, as well as any groups with sample sizes below the minimum threshold of 2% of the audit dataset (per §5-301(d), a minimum of 2%, equivalent to 82 candidates in this audit dataset, is required for reliable statistical analysis). Excluded groups are marked with an N/A or asterisk (*). These groups are reported for transparency but are not used as reference groups.

Impact Ratio Analysis: Sex

Sex	# of Applicants	Selection Rate	Impact Ratio
Unknown	15643	82.70	1.02*
Female	2032	78.69	0.97
Male	2938	81.21	1.0

Impact Ratio Analysis: Race/Ethnicity

Race/Ethnicity	# of Applicants	Selection Rate	Impact Ratio
Unknown	14636	82.47	0.95"
Black or African American (Not Hispanic or Latino)	2029	77.77	0.89
White (Not Hispanic or Latino)	290	86.90	1.0
Hispanic or Latino	1570	79.75	0.92
I choose not to disclose	1830	85.46	0.98*
Asian (Not Hispanic or Latino)	85	0.0	0.76
Native Hawaiian or Other Pacific Islander	15	0.0	1.07*
Native American or Alaska Native	29	79.31	0.91*
Two or More Races (Not Hispanic or Latino)	129	86.82	1.0

Impact Ratio Analysis: Intersectional

Race/Ethnicity	Sex	# of Applicants	Scoring Rate	Impact Ratio
Unknown	Unknown	14636	82.47	0.95*
Unknown	Female	0	N/A	N/A
Unknown	Male	0	N/A	N/A
Black or African American (Not Hispanic or Latino)	Unknown	4	100.0	1.15*
Black or African American (Not Hispanic or Latino)	Female	735	77.14	0.89*
Black or African American (Not Hispanic or Latino)	Male	1290	78.96	0.9*
White (Not Hispanic or Latino)	Unknown	0	N/A	N/A
White (Not Hispanic or Latino)	Female	102	86.27	0.99
White (Not Hispanic or Latino)	Male	185	87.63	1.0
Hispanic or Latino	Unknown	5	60.0	0.69*

Race/Ethnicity	Sex	# of Applicants	Scoring Rate	Impact Ratio
Hispanic or Latino	Female	713	77.0	0.88
Hispanic or Latino	Male	852	82.16	0.94
I choose not to disclose	Unknown	994	86.02	0.99*
I choose not to disclose	Female	380	83.68	0.96*
I choose not to disclose	Male	456	85.75	0.99*
Asian (Not Hispanic or Latino)	Unknown	0	N/A	N/A
Asian (Not Hispanic or Latino)	Female	33	66.67	0.77
Asian (Not Hispanic or Latino)	Male	52	65.38	0.75
Native Hawaiian or Other Pacific Islander	Unknown	0	88.89	1.02
Native Hawaiian or Other Pacific Islander	Female	9	0.0	0.0*
Native Hawaiian or Other Pacific Islander	Male	6	100.0	1.15

Race/Ethnicity	Sex	# of Applicants	Scoring Rate	Impact Ratio
Native American or Alaska Native	Unknown	0	N/A	N/A
Native American or Alaska Native	Female	11	81.82	0.94*
Native American or Alaska Native	Male	18	77.78	0.89*
Two or More Races (Not Hispanic or Latino)	Unknown	1	100.0	1.15*
Two or More Races (Not Hispanic or Latino)	Female	49	77.55	0.89*
Two or More Races (Not Hispanic or Latino)	Male	79	92.41	1.06*

Appendix: Statistical Analysis and Methodology

This section explains the essential testing concepts used in the audit. These measures help determine: Whether the AEDT treats demographic groups fairly and whether the results of our audit are statistically sound and reliable.

Sample Size

Our analysis requires a minimum of 82 candidates per group to ensure statistical reliability. Simple 2% rule applied:

1. Using minimum group size of 82 candidates per group.
2. This represents 2% of the total effective sample (4,134).
3. Groups smaller than 2% of total effective sample are excluded from impact ratio calculations.

Selection Rate and Scoring Rate

	Selection Rate (Threshold-Based)	Scoring Rate (No Threshold / Continuous)
When to Use	When the tool gives binary or categorized results	When the tool gives a numerical score
Definition of "Positive Outcome" or "Success"	Being assigned a positive classification or recommendation.	Scoring above the Overall Median
Success Count (n)	Number of individuals in a group who were "Selected."	Number of individuals in a group with Score > Overall Median.
Total in Group (N)	Total number of individuals in that specific group.	Total number of individuals in that specific group.
Formula for Rate	Selection Rate = n divided by N	Scoring Rate = n divided by N

Impact Ratio

Impact ratios measure fairness across demographic groups.

$$\text{Impact Ratio} = \frac{\text{Selection Rate for a Group}}{\text{Selection Rate of the Most Selected Group}}$$

or

$$\text{Impact Ratio} = \frac{\text{Scoring Rate for a Group}}{\text{Scoring Rate of the Highest Scoring Group}}$$

While the NYC Local Law 144 itself sets no pass/fail threshold, we interpret the results using the EEOC's 80% rule (29 CFR § 1607.4D).

1. An impact ratio below 0.80 may suggest a potential fairness concern (based on the "four-fifths rule").
2. An impact ratio below 0.60 is considered a high-risk indicator and should be reviewed immediately.

Statistical Significance

We use statistical tests to determine if observed differences between groups are meaningful or could be due to random chance.

1. Statistical significance tells us if an observed difference is larger than what we would expect from random variation.
2. For each comparison, we calculate a p-value, which is the probability of observing a difference at least as large as the one found if, in reality, the tool treated all groups identically.
3. A p-value below 0.05 (5%) suggests the difference is statistically significant and less likely to be due to random chance.

By combining these measures, we ensure our audit provides a comprehensive and reliable assessment of potential disparate impact.

About New York City Local Law 144 Bias Audits

New York City Local Law 144 mandates that employers and employment agencies conduct independent bias audits on automated employment decision tools (AEDTs) before using them in hiring or promotion decisions. The audits must assess whether the AEDT exhibits disparate impact based on sex, race/ethnicity, or other protected characteristics by analyzing selection rates. Employers must also provide public disclosures about the audit results and notify candidates when an AEDT is used in their evaluation. Compliance with Local Law 144 ensures greater transparency and fairness in hiring practices.

About Asenion

Asenion is a leader in AI Trust, Risk, and Security Management, specializing in independent qualitative assessments and quantitative testing for AI models and LLM applications. With proven expertise in financial services, Asenion extends established Model Risk Management governance processes—including stress testing, scenario analysis, and benchmarking—to AI, ensuring safe, secure, and compliant adoption. Our work with institutions like the Vector Institute and Partnership on AI demonstrates our commitment to AI ethics and governance. As NYC Local Law 144 requires rigorous bias audits of automated employment decision tools, Asenion's deep technical expertise, regulatory knowledge, and independent testing capabilities make us a highly qualified auditor. Asenion is SOC2 Type 2 and ISO/IEC 42001 certified.