

PRIVACY IMPACT ASSESSMENT

Foreign Service Officer Test (FSOT) PIA

1. Contact Information

A/GIS Deputy Assistant Secretary Bureau of Administration Global Information Services

2. System Information

(a) Date of completion of this PIA:

7/27/2021

(b) Name of system:

Foreign Service Officer Test

(c) System acronym:

FSOT

(d) Bureau:

Global Talent Management (GTM)

(e) iMatrix Asset ID Number:

1074

(f) Child systems (if applicable) iMatrix Asset ID Number:

N/A

(g) Reason for performing PIA:

- New system
- Significant modification to an existing system
- To update existing PIA for a triennial security reauthorization

(h) Explanation of modification (if applicable):

N/A

3. General Information**(a) Does the system have a completed and submitted data types document in Xacta?** Yes No - Contact IRM/IA at IASolutionCenter@state.gov for assistance.**(b) Is this system undergoing an Assessment and Authorization (A&A)?** Yes No

If yes, has the privacy questionnaire in Xacta been completed?

 Yes No**(c) Describe the purpose of the system:**

The Foreign Service Officer Test (FSOT) system supports the Department of State Bureau of Global Talent Management (GTM) mission requirements for recruiting Foreign Service Officers for the United States government. The FSOT application is composed of several components to process information during various parts of the recruiting process. These include registering candidates to take the FSOT, scheduling and administering the FSOT, maintaining the candidate's registration profile, scoring the FSOT, forwarding scores and candidate information to the Department of State (DoS) for further selection processing, and scheduling the oral examination for selected candidates. The process starts with the FSOT applicant website, which collects the initial registration information from the candidate and schedules a time/place to take the test. At the arranged time/place (one of the Pearson test taking sites or designated Department of State posts), the candidate is prompted to enter their biographical information (title, first name, last name, middle initial, suffix, date of birth, age, social security number, address, country, phone number, e-mail address, ethnicity, disability, gender, education, overseas experience, military experience, security clearance, language, and work experience) and answer other questions relevant to the position of Foreign Service Officer. The questions for the test are generated using Pearson VUE proprietary software and systems called the VUE Testing System (VTS). The responses are scored and stored in an SQL database, and transmitted securely to GTM for processing.

(d) Describe the personally identifiable information (PII) that the system collects, uses, maintains, or disseminates:

The following elements of PII are collected and maintained:

- Full Name
- Social Security number (SSN)
- Date of Birth (DoB)
- Age
- Nationality

- Mailing Address
- Permanent Address
- Personal Email Address
- Home Phone Number
- Cell Phone Number
- Work Phone Number
- Ethnic Background/Race
- National Origin (RNO)
- Gender
- Salary
- Education
- Employment History
- Military status
- Disability status
- Other Names (Aliases)

The person applying for a DoS Foreign Service Officer position is the only source of PII. Such persons may include current DoS employees, employees from other federal agencies, and members of the public.

(e) What are the specific legal authorities and/or agreements that allow the information to be collected?

- 22 U.S.C. 2581 (General Authority of Secretary of State)
- 22 U.S.C 2651a (Organization of the Department of State)
- 22 U.S.C 2901 et seq. (Foreign Service Act of 1980)
- 22 U.S.C. 3921 (Management of the Foreign Service)
- 22 U.S.C 4041 (Administration of the Foreign Service Retirement and Disability System)
- 5 U.S.C. 301-302 (Management of the Department of State)
- Executive Order 9397, as amended (Numbering System for Federal Accounts Relating to Individual Persons)
- Executive Order 9830 (Amending the Civil Service Rules and Providing for Federal Personnel Administration)
- Executive Order 12107 (Relating to the Civil Service Commission and Labor-Management in the Federal Service)

(f) Is the information searchable by a personal identifier (e.g., name or Social Security number, etc.)?

Yes, provide:

- SORN Name and Number:
Human Resources Records, State-31

- SORN publication date (found under the Volume Number and above the Public Notice Number on the published SORN):
July 19, 2013

No, explain how the information is retrieved without a personal identifier.

- (g) Does the existing SORN need to be amended to reflect the inclusion of this new or significantly modified system?** Yes No

If yes, please notify the Privacy Office at Privacy@state.gov.

- (h) Is there a records retention schedule submitted to or approved by the National Archives and Records Administration (NARA) for this system?** Yes No
(If uncertain about this question, please contact the Department's Records Officer at records@state.gov.)

If yes provide (Consolidate as much as possible):

A-04-003-01a FSO Written Examination Master File

Description: Consist of one copy of the FSO Written Examination for each year.

Disposition: PERMANENT: Retire to RSC every 5 years for transfer to the WNRC. Transfer to the National Archives when 25 years old. (NC1-59-80-20, items 1a and 1b)

DispAuthNumber: N1-059-00-07, item 9

A-04-003-03a Examination General Subject Files

Description: Arranged by subject. Includes correspondence and memoranda relating to preparation and grading of Written Examination by a contract testing service; procedures for oral examinations; lists of candidates designated for appointment; press releases or other publicity on examinations; and any other pertinent reports or studies. a. Recordkeeping copy (paper).

Disposition: PERMANENT. Retire to RSC when 5 years old for transfer to WNRC. Transfer to the National Archives when 25 years old. (NC1-59-80-20, item 3)

DispAuthNumber: N1-059-00-07, item 11a

A-04-003-04 Readers Reports on Written Examinations

Description: Master File of Reports.

Disposition: Permanent. Retire to RSC when 5 years old. Transfer to National Archives when 20 years old.

DispAuthNumber: NC1-059-80-20, item 4a

A-04-003-05 Summary and Oral Examination Rating Sheets

Description: N/A

Disposition: Destroy 5 years after date of examination.

DispAuthNumber: NN-171-171, item

A-04-003-07a Application for Designation to Take Written Examination - Includes applications, biographic and other data submitted by candidate

Description: Applicants ruled ineligible to take or who are designated to take the written examination but withdraw or fail to appear for examination.

Disposition: Destroy 6 months from date of examination.

DispAuthNumber: II-NNA-400, items 9a and 9b

A-04-003-08a Dossiers - Successful FSO Candidates

Description: Dossiers of officer candidates who were certified for and accepted appointment. Includes correspondence with applicant, report of Oral Assessment, and information on experience. a. Recordkeeping copy (paper).

Disposition: TEMPORARY: Retire to RSC 2 years after the year of appointment for transfer to WNRC. Destroy when 7 years old.

DispAuthNumber: N1-059-00-07, item 14a

A-04-003-09a(1) Dossiers - Unsuccessful FSO Candidates

Description: a. Dossiers of officer candidates who, after having taken the Written Examination, were determined to be eligible for the Oral Assessment but were not appointed. Includes correspondence with applicant, report of any Oral Assessment, and information on experience. (1) Recordkeeping copy (paper).

Disposition: TEMPORARY: Retire to RSC 2 years after the year of the Written Examination for transfer to WNRC. Destroy when 7 years old. (NC1-59-83-6, item 3)

DispAuthNumber: N1-059-00-07, item 15a(1)

A-04-003-09b(1) Dossiers - Unsuccessful FSO Candidates

Description: b. Dossiers of officer candidates who, after having passed the Qualifications Evaluation Panel process, took the oral examination but were not appointed. Includes correspondence with applicant, report of the oral examination, and information on experience. (1) Recordkeeping copy (paper).

Disposition: TEMPORARY: Destroy 2 years from the date of the most recent documentation.

DispAuthNumber: N1-059-00-07, item 15b(1)

A-04-003-09c(1) Dossiers - Unsuccessful FSO Candidates

Description: c. Dossiers of officer candidates who failed the Qualifications Evaluation Panel Process or who, having passed that process, failed to take the oral examination. Includes correspondence with applicant and information on experience. (1) Recordkeeping copy (paper).

Disposition: TEMPORARY: Retire to RSC 2 years after the year of the oral examination for transfer to WNRC. Destroy when 7 years old.

DispAuthNumber: N1-059-00-07, item 15c(1)

A-04-003-14a Dossiers - Successful Specialist Candidates

Description: Dossiers of specialist candidates who were certified for and accepted appointment. Includes correspondence with applicant, report of oral examination, and information on experience. a. Recordkeeping copy (paper).

Disposition: TEMPORARY: Retire to RSC 2 years after the year of appointment for transfer to WNRC. Destroy when 7 years old. (NC1-59-83-6, item 4)

DispAuthNumber: N1-059-00-07, item 16a

A-04-003-15a(1) Dossiers - Unsuccessful Specialist Candidates

Description: a. Dossiers of specialist candidates who, having passed the Qualification Evaluation Panel process, took the oral examination but were not appointed. Includes correspondence with applicant, report of oral assessment, and information on experience. (1) Recordkeeping copy (paper).

Disposition: TEMPORARY: Retire to RSC 2 years after the year of the oral examination for transfer to WNRC. Destroy when 7 years old. (NC1-59-83-6, item 5)

DispAuthNumber: N1-059-00-07, item 17a(1)

A-04-003-15b(1) Dossiers - Unsuccessful Specialist Candidates

Description: b. Dossiers of specialist candidates who failed the Qualification Evaluation Panel process or who, having passed that process, failed to take the oral examination. Includes correspondence with applicant and information on experience. (1) Recordkeeping copy (paper).

Disposition: TEMPORARY: Destroy 2 years from the date of the most recent documentation.

DispAuthNumber: N1-059-00-07, item 17b(1)

A-04-003-19a Examination Policy and Procedure File

Description: Consist of correspondence, reports, reference material, policy documentation and procedural matters relating to the development and administration of the Examination process. a. Recordkeeping copy (paper).

Disposition: PERMANENT: Retire to RSC when 10 years old for transfer to WRNC. Transfer to the National Archives when 25 years old.

DispAuthNumber: N1-059-00-07, item 19a

A-04-003-20 FSO Written Examination Results

Description: Registers of candidate names and statistical tabulations submitted by the contract testing service.

Disposition: TEMPORARY: Retire to RSC when 7 years old for transfer to WNRC. Destroy when 20 years old. (NC1-59-80-20, item 4b)

DispAuthNumber: NC1-059-00-07, item 12.

4. Characterization of the Information

(a) What entities below are the original sources of the information in the system? Please check all that apply.

- Members of the Public
- U.S. Government employees/Contractor employees
- Other (people who are not U.S. Citizens or LPRs)

(b) On what other entities above is PII maintained in the system?

- Members of the Public
- U.S. Government employees/Contractor employees
- Other
- N/A

(c) If the system contains Social Security Numbers (SSNs), is the collection necessary?

- Yes No N/A

- If yes, under what authorization?

Authorization for the Department to perform SSN collection comes from the following:

- 26 CFR 301.6109, Taxpayer identification;
- Executive Order 9397, Federal employment; and
- 20 CFR 10.100, Federal Workers' Compensation allow the Department to collect SSN for employment, payroll, tax identification and benefit purposes.

(d) How is the PII collected?

Information is collected directly from applicants through the FSOT system. The process starts with the FSOT application website which takes the initial registration information from the candidate and schedules a time/place to take the test. At the arranged time/place (one of the Pearson test taking sites or designated Department of State posts), the candidate is prompted to enter their biographical information into the FSOT application website and answer other questions relevant to the position of Foreign Service Officer. Pearson personnel ensures that the candidate information entered at the testing site matches the information used in the initial registration.

(e) Where is the information housed?

- Department-owned equipment
- FEDRAMP-certified cloud
- Other Federal agency equipment or cloud
- Other

- If you did not select "Department-owned equipment," please specify.

The information is housed in SQL Server Database managed by Pearson VUE located at Pearson Datacenter in Iowa City, IA. The Department of State and Pearson VUE contract

contains extensive privacy and security requirements on the contractor's responsibilities as the host of the information.

(f) What process is used to determine if the PII is accurate?

The applicant is responsible for accuracy of the information. The applicant will have the opportunity to verify and make changes to his/her personal and demographic information during the application process. Once an applicant has submitted their registration package, an applicant may not amend any part of it except to update contact information (i.e., phone numbers, mailing address, and email address).

(g) Is the information current? If so, what steps or procedures are taken to ensure it remains current?

The applicant is responsible for making sure their information remains current. The applicant may change contact information (i.e., phone numbers, mailing address, and email address) by going into their profile and editing the information.

(h) Does the system use information from commercial sources? Is the information publicly available?

The system does not use information from commercial sources or publicly available information.

(i) How was the minimization of PII in the system considered?

The Board of Examiners, system owner, and information system security officer (ISSO) work together to review the fields collected from applicants seeking to take the FSOT. All efforts are made to ensure that only the necessary PII elements needed to verify identity of the applicant, ensure no duplication of applicant records in the system, ability to verify eligibility of applicants, ability to contact applications throughout the FSOT process, and ability to initiate on-boarding activities are collected and stored by the system.

5. Use of information

(a) What is/are the intended use(s) for the PII?

The PII collected by the system is used to verify the identity of applicants, ensure no duplication of applicant records in the system, verify the eligibility of applicants, enable the Board of Examiners to contact applications throughout the FSOT process, and enable the Board of Examiners to initiate on-boarding activities.

(b) Is the use of the PII relevant to the purpose for which the system was designed or for which it is being designed?

Yes, the use of the PII within the FSOT system is relevant to the purpose for which the system was designed.

(c) Does the system analyze the PII stored in it? Yes No

If yes:

(1) What types of methods are used to analyze the PII?

PII is analyzed against rules (e.g. age requirements) provided to FSOT by the Department of State to determine candidate eligibility. FSOT then analyzes the candidates PII, such as DOB and/or age, to ensure that the candidates are eligible to take the FSOT.

(2) Does the analysis result in new information?

The analysis does not result in new information.

(3) Will the new information be placed in the individual's record? Yes No

(4) With the new information, will the Department be able to make new determinations about the individual that would not have been possible without it?

Yes No

(d) If the system will use test data, will it include real PII?

Yes No N/A

If yes, please provide additional details.

6. Sharing of PII

(a) With whom will the PII be shared internally and/or externally? Please identify the recipients of the information.

Internal: The information collected by FSOT is housed in a SQL Server Database managed by Pearson VUE and only enters the Department's network when it is sent GTM. Under the purview of the Bureau of Global Talent Management, Executive Office (GTM/EX), PII is shared with Integrated Personnel Management System (IPMS).

External: N/A

(b) What information will be shared?

Internal: All PII elements collected and stored by FSOT are shared with IPMS. Information shared includes personal data (full name, social security number (SSN), date of birth, nationality, mailing address, personal email address, phone number, race, national origin, salary, education, military

status, disability status) related to examination scores and employment qualifications.

External: N/A

(c) What is the purpose for sharing the information?

Internal: Applicant PII is shared with IPMS in order to allow hiring managers to streamline the applicant review and potential offer letter process. In addition, IPMS is hosted on the Department's OpenNet network and is the approved long-term retention system for the Department's Human Resource data prior to the required archival to the National Archives and Records Administration (NARA).

External: N/A

(d) The information to be shared is transmitted or disclosed by what methods?

Internal: Information is shared by secure network transmission methods permitted under Department policy for the handling and transmission of SBU information including Transport Layer Security (TLS) v1.2. Data are exchanged with IPMS, specifically with the Recruitment, Examination, and Employment Tracking Application (REETA), an IPMS sub system, via secure file transfer protocol (SFTP) hosted by PearsonVUE.

External: N/A

(e) What safeguards are in place for each internal or external sharing arrangement?

Internal: Candidate examination and personal data are shared with DoS through SFTP. DoS ensures that only a subset of cleared employees with elevated privileges have access to the SFTP site and process to ensure delivery of the data. The FSOT product owner ensures that all users with access to the data within DoS are approved via request forms submitted by appropriate supervisors.

External: N/A

7. Redress and Notification

(a) Is notice provided to the record subject prior to the collection of his or her information?

Yes. FSOT displays a Privacy Act statement which discloses the authorities that support the data collection, the purpose and type of data that will be collected, and any pertinent disclosures.

(b) Do record subjects have the opportunity to decline to provide the PII or to consent to particular uses of the PII? Yes No

If yes, how do record subjects grant consent?

By reading the Privacy Act statement and providing their information, users consent to the collection and storage of their PII.

If no, why are record subjects not allowed to provide consent?

(c) What procedures allow record subjects to gain access to their information?

To gain access to their account, a candidate must visit <http://www.pearsonvue.com/fsot/> and sign in using the username and password that they created during initial registration. If the candidate has forgotten either the username or password, they may click on the “I forgot my username or password” link below the log in boxes. They can then gain access to their account by answering security questions and using the e-mail address used to create their account. They also have the option of contacting Pearson VUE’s customer service at this link (<http://www.pearsonvue.com/fsot/contact/>) to get assistance with accessing their account.

Candidates have access to their past form information indefinitely. However, the past forms are never reused. Candidates are required to submit updated forms for each exam which is only offered at quarterly intervals or “events”.

(d) Are procedures in place to allow a record subject to correct inaccurate or erroneous information? Yes No

If yes, explain the procedures.

Applicants may update their contact information on their own. If a candidate wants to change their name, SSN, or date of birth, they must submit documentation to the Pearson VUE team for review and the edits will be made for them. Candidates have access to all of their past form information indefinitely. However, candidates are required to submit updated forms for each exam.

If no, explain why not.

(e) By what means are record subjects notified of the procedures to correct their information?

Applicants are notified of the procedures to correct their information at the bottom of the FSOT application site when they first register . Also, applicants are informed of this if they contact Pearson VUE.

8. Security Controls

(a) How is all of the information in the system secured?

The information in FSOT is secured through implementation of the minimum baseline of controls for a Moderate impact system for confidentiality, integrity, and availability. Security controls are specific to FSOT control descriptions in National Institute of Standards and Technology (NIST) SP 800-53. Access to the application from an end user and user with elevated privileges are controlled by the application administrators. Application identifiers and authenticators are provisioned based on the NIST SP 800-53 and DoS requirements. The server operating system, web servers, applications, and databases are configured to meet security standards and best practices.

Account privileges are based on roles with the concept of least-privilege and need-to-know. Users with elevated privileges have their access reviewed annually to ensure segregation of duties and need to know. The FSOT and DoS servers that support the system and the data sharing are scanned regularly, and any vulnerabilities are remediated in a timely manner. Both PearsonVue and DoS employ data at rest and data in transit encryption.

(b) Explain the different roles that have been created to provide access to the system and the PII (e.g., users, managers, developers, contractors, other).

Both PearsonVue and DoS maintain different roles to provide access to the system and the PII. These roles are listed below and described in the System Security Plan.

- System administrators are limited to authorized Pearson personnel. Administrative access to the Pearson VUE servers are reviewed on a quarterly basis to ensure access is restricted to authorized personnel. GTM system administrators perform necessary functions involved in the data transfer from FSOT to DoS.
- Database administrators are limited to authorized Pearson personnel. Access to key databases (DBA and direct access) is reviewed on a quarterly basis.
- Firewall administrators are limited to authorized Pearson personnel. Firewall administrator access to the firewall is reviewed twice a year by the IT Security team.
- Application users are limited to authorized Pearson personnel and personnel in the Board of Examiners office of GTM. Application users are provisioned and de-provisioned access through a formal and documented process. Application access is reviewed and validated on a bi-annual basis or annual basis.
- General users of the FSOT system are potential employees of the Foreign Service. This includes people located domestically and abroad who wish to apply for a Foreign

Services position. They are not permitted access to anything except the test and their profile data.

- (c) Describe the procedures established to limit system and data access to only those individuals who have an “official” need to access the information in their work capacity.**

Full information on assignment of users to roles is documented in the FSOT System Security Plan. Role assignment is controlled based on application. All users with access to PII other than their own within the FSOT system or the IPMS and PRAS systems must have user access forms submitted, signed, and approved by their supervisor and the product owner prior to access. Supervisors and all DoS users with access to PII are required to take PA318 - Protecting Personally Identifiable Information mandatory biennial training to ensure that they are aware of their responsibilities related to PII, including the principle of only accessing and distributing PII for official needs. Users who do not take the required PII training lose access to the DoS network on which the systems/data reside. Users also must take a Code of Conduct training and Security and Data Privacy training for Pearson. Annual/quarterly user access reviews ensure that users who no longer have an official need to access PII have their roles removed.

- (d) How is access to data in the system determined for each role identified above?**

Users or supervisors submit access request forms indicating the roles that each user needs to perform their duties. Access requests are approved by a supervisor. In most cases, elevated users are determined based on their official position within PearsonVue and the Department and individual Division/Office, such as the employees and contractors in the Board of Examiners Office within GTM/Talent Acquisitions Division.

- (e) What monitoring, recording, auditing safeguards, and other controls are in place to prevent the misuse of the information?**

FSOT implements the NIST privacy controls to ensure that access to PII is documented, monitored, logged, and audited. PearsonVue and the Department of State security teams perform audits of access and use to ensure that misuse is identified. Data at rest and in transit are encrypted with approved cryptographic technology that meets federal mandates. All users with access to PII are required to take annual training to inform their understanding of their responsibilities to protect and avoid misuse of PII. Incident response plans are maintained to ensure that users have appropriate avenues to report potential misuse of PII to PearsonVue and/or the Department of State.

- (f) Are procedures, controls or responsibilities regarding access to data in the system documented?** Yes No

- (g) Explain the privacy training provided to each role identified in 8(b) that has access to PII other than their own.**

All DoS users are required to take the biennial mandatory PII Training, PA318 - Protecting Personally Identifiable Information. They are also required to take the CyberSecurity Awareness course PS800, which contains a privacy module. Failure to take/pass the training results in the user losing access to the Department network.

PearsonVue is required to ensure that they meet the requirements of the Computer Security Act of 1987 which mandates that all users of automated information systems owned or operated by the federal government receive specific training and education with respect to their roles and responsibilities in safeguarding systems and information processed, stored, or transmitted on such systems. The trainings include:

- Pearson VUE Security and Data Privacy: Security Best Practices for Working from Home; Course ID: 0000067640 V v1 202103222021
- Information Security and Data Privacy Training; Course ID: 0000066394 V v1 20210224
- Pearson VUE Security and Data Privacy 2020; Course ID: 0000043210 V v1 202006292020
- Code of Conduct Certification & Conflict of Interest Disclosure; Course ID: 0000056297 V v1 20200909