PRIVACY IMPACT ASSESSMENT

Gateway Access To Official Records (GATOR)

1. Contact Information

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

2. System Information

(a) Date of completion of this PIA: March 2023
(b) Name of system: Gateway Access To Official Records
(c) System acronym: GATOR
(d) Bureau: EUR-IO
(e) iMatrix Asset ID Number: 341684
(f) Child systems (if applicable) and 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):

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 Gateway Access To Official Records (GATOR) system is engineered for the custom needs of the European and Eurasian Affairs and International Organizations/Executive Office/Human Resources (EUR-IO/EX/HR). GATOR will do mass paper/electronic document scans of EUR-IO/EX/HR documents, providing content that can be used for management, access, retrieval, and knowledge management business processes. This includes managing the employee or applicant lifecycles from hiring to dismissal, and thus

contains many different HR documents associated with the employee that are already held in physical form by the HR office. Those paper documents will be stored in GATOR in a more effective and secure manner. The system will use artificial intelligence engineered by the Gator Engineering Team located in Bureau of European and Eurasian Affairs and International Organizations/Executive Office/Information Management (EUR-IO/EX/IM) to help with the ingestion, including semi-automate/automate document type identification and metadata capture. The artificial intelligence reviews the documents and sorts them based on the information within the documents, such as date or name. The information is being collected in GATOR for HR business uses, such as locating position descriptions, making reference documents more accessible for HR, and using the metadata to find documents more easily. Documents are scanned into the system based on need.

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

Name
Personal email addresses
Personal phone number
Personal address
Partial/Full Social Security Number (SSN)
Date of birth
Place of birth
Citizenship
Educational Information
Financial Information
Mother's maiden name

(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)
5 U.S.C. 301-302 (Management of the Department of State)

(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):

- Schedule number (e.g., (XX-587-XX-XXX)):
  A-03-002-01

- Disposition Authority Number:
  DAA-GRS-2014-0002-0002 (GRS 2.1, item 020)

- Length of time the information is retained in the system:
  Temporary. Destroy 2 years after position is abolished or description is superseded, but longer retention is authorized if required for business use.

- Type of information retained in the system:
  Position descriptions, position data, and vacancy related data

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?

(d) How is the PII collected?

HR-related documents (containing PII) are collected from employees during their lifecycle in EUR. Those documents are then captured in the GATOR system using a Commercial Off the Shelf tool called “Ephesoft”. HR documents will be scanned to locations specified by HR specialists via a scanner that connects to their workstations and submits the documents as PDF files directly into the GATOR system.

(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 GATOR system will store data on the Microsoft Government Cloud.

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

All PII is already captured in the documents prior to the documents being scanned into and processed by GATOR. There is no validation of the accuracy of the PII by GATOR since the documents originate from HR.

The GATOR system is able to score the scan-accuracy of all fields to determine how confident the intelligence is that the field is correctly captured. If the system is not confident in a captured field, for example a handwritten date, the system notifies users to review and validate captured values against the underlying documents, which is required by business processes.

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

Data primarily relates only to the specific document it is derived from, and is therefore kept as current as the original document. HR may not want to erase old data with new data, but if new data is provided, such as a new resume, HR can add that information to the system. Both documents would thus be present, and HR would use the most appropriate document for their business needs.

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

The information in GATOR is not collected from commercial sources. The information is not collected from publicly available sources.

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

EUR-IO/EX/HR ensured that the minimum amount of PII is collected for what would be needed for reference by HR staff.

5. Use of information

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

The use of the PII is incidental to the system's purpose of collecting, sorting, and maintaining the documents for HR business purposes and for managing the employee's lifecycle. As the system collects and sorts documents within the system, HR is able to search for these documents in order to carry out business purposes. These business purposes are not necessarily done within the system, examples include review of positions, accessing position descriptions or vacancy data, and review of position descriptions.

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

PII is relevant to the system purpose as it is part of the source documents. The HR specialists are not altering the source document rather they are referencing the final document to retrieve and analyze the full content of documents. The PII is already within the document prior to being put in GATOR.

(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?

(2) Does the analysis 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.

Minimial amount of PII, like the incumbent's name, which is found on position documents and vacancy documents will be used as test data.

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 PII may be shared with other vested offices and bureaus within the Department who have a need to know such as the Office of the Legal Adviser (L), Diplomatic Security (DS), HR Service Center (HR/SS), or Global Talent Management offices including Retirement (GTM/RET), Performance Evaluation (GTM/PE), and Conduct Suitability Discipline (GTM/CSD).

External:
The PII may be shared with outside parties such as retained attorneys who are representing employees for litigation. This information would need to be requested and authorized via the Department's Office of the Legal Adviser.

(b) What information will be shared?

Internal:
The information shared includes any PII listed in 3d that is needed to complete actions for the employee. These actions relate to the entire lifecycle of the employee from hiring to dismissal. Information would not be shared if there is no necessary requirement for it.

External:
The information shared includes PII as it is needed to complete actions for the employee. Information would not be shared if there is no necessary requirement for it.

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

Internal:
The purpose of sharing would be to assist the employee to acquire benefits and entitlements as a Department employee, including any actions that relate to the lifecycle of the employee from hiring to dismissal.

External:
Information would only be shared if it is authorized to do so by L or DS in order to support ongoing litigation or other situations in which it is legally required.

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

Internal:
Information is shared via secure OpenNet Department email.

External:
Information is shared via an outgoing secure OpenNet Department email.

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

Internal:
The bureau follows the regulations of the Department such as using secure Outlook email, using the sensitivity markers within Outlook, marking documents appropriately that contain PII, and, at times, using other safeguarding methods such as Outlook's "do not forward" feature.

External:
The bureau follows the regulations of the Department such as using secure Outlook email, using the sensitivity markers within Outlook, marking documents appropriately that contain PII, and, at times, using other safeguarding methods such as Outlook's "do not forward" feature.

7. Redress and Notification

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

GATOR does not collect information directly from the record subjects, therefore notice is not provided. The information in GATOR is found in previously provided, standard HR documents, such as positions descriptions, which were created prior to the system.

(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?

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

Record subjects have already provided this information and it is in their standard HR documents which were created prior to the system. Record subjects have the opportunity to decline at the point of collection. Documents are being ingested into the system for sorting and maintenance after they have been created. There is no opportunity to consent to particular uses of the PII.

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

Only approved HR specialists are granted access to the system as being a part of the appropriate access role. The record subjects do not have access to GATOR. Any changes

to their information would have to be done in the source documents when they submit new documents to HR.

(d) Are procedures in place to allow a record subject to correct inaccurate or erroneous information?

☐Yes ☒No

If yes, explain the procedures.

If no, explain why not.

All changes to documents happen prior to the ingestion of the documents into GATOR. In order to correct inaccuracies, a record subject would need to submit a new document to HR, and that document may later be ingested into GATOR. There is no opportunity or procedure for record subjects to change information, erroneous or otherwise, within the GATOR system, as record subjects do not have access. The system is for internal HR use only and external subjects will not have access to the data.

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

As record subjects have no access to GATOR, they would not know of inaccuracies in GATOR, only in the source documents, which they would correct by submitting new documents per policies in their offices. As referenced above the source document of the PII is not involved with Gator. Record subjects will not have access to Gator; as Gator is dealing with documents already created and is removed from the source information, including any collection or correction of that source information.

8. Security Controls

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

GATOR secures information with FIPS compliant Azure encryption, and uses encryption at rest. GATOR uses TLS certifications for data in transit and uses role based access to further secure access to specific information.

(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).

HR Specialists have two roles, both with access to the system in order to find and retrieve HR documents required for their day-to-day jobs and business processes. Both roles have access to all PII listed in 3d. Both roles will be able to validate documents, however their ability to validate, scan, or review documents can be restricted on an individual basis.

General Access HR Specialist – Has access to less sensitive documents, such as resumes, position descriptions, etc. While this role has access to the same PII as the Special-access HR Specialist, the documents will be less sensitive in nature, as clarified below.

Special-access HR Specialist – has access to the same PII as the General Access HR Specialist, but will have access to information that is deemed more sensitive, as it can pertain to litigation, grievance, or ongoing HR investigations, and/or may include information that could be considered derogatory to the employee.

System Administrator – This role is reserved for the GATOR support team from EUR-IO/EX/IM that will provide maintenance and troubleshooting for the system. This role has access to all PII listed in 3d.

(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.

The GATOR team uses the Department's Active Directory as a model for determining who goes into which roles based on who is part of the HR team, but the team develops unique user groups based on the needs of HR. All roles must be approved by HR management.

The system uses Role-Based Access Controls (RBACs) to manage access in the system. It is a business decision by HR to determine which HR specialist works on which feature and role in the system, granted that they have access to the system. Within those roles, HR can limit who is doing validation, reviewing, or scanning.

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

HR management approval is required for any access to any role in the GATOR system. Once HR determines that they will grant access, an email will be sent to the GATOR support team requesting access. Access will be taken away at the end of employment in the HR group, or at the discretion of HR management. Once HR determines that access will be removed, an email will be sent to the GATOR support team requesting the removal of access. Access to the general-access role versus the special-access role depends on the employee's position and portfolio.

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

GATOR uses the auditing controls within Microsoft Azure. Azure will detect all unauthorized attempts to access system resources such as servers and databases within the environment. HR specialists will only have access to data via a controlled, web front-end with no access or ability to copy or transmit data outside the system from within the system. Users who have the correct role will be able to download and copy or transmit data outside the system.

(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 OpenNet users with access to GATOR are required to take the mandatory PS800 - Cybersecurity Awareness Training, which has a privacy component, annually and the PA318 “Protecting Personally Identifiable Information” training on a biennial basis. There are no additional role-based privacy trainings.