

# PRIVACY IMPACT ASSESSMENT

## Global Merit Based Compensation

### 1. Contact Information

<b>A/GIS Deputy Assistant Secretary</b> Bureau of Administration Global Information Services
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### 2. System Information

- (a) **Date of completion of this PIA:** April 2023  
(b) **Name of system:** Global Merit Based Compensation  
(c) **System acronym:** GoMBC  
(d) **Bureau:** Bureau of European Affairs- International Organizations (EUR-IO/EX)  
(e) **iMatrix Asset ID Number:** 297527  
(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):** Employee ID is now being collected in Overseas Award System (OAS) as part of the Application Development Group's (ADG) addition of an Awards module to the Global Merit Based Compensation (GoMBC) ATO boundary.

### 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](mailto: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 purpose of Global Merit Based Compensation (GoMBC) is to track and manage the locally employed (LE) staff members' performance management and Merit Based Compensation (MBC) reward for overseas missions worldwide. GoMBC provides and retains performance management documentation (annual work plan, mid-year discussion and Employee Performance Reports (EPR)) and calculates the MBC reward based on an employee's individual level of performance and contribution to the mission.

The Overseas Awards System (OAS), a cloud-based application that is a connected module of GoMBC, provides a worldwide framework for all LE Staff employed at the Department of State and other agencies. The module will encompass the complete process of submitting an award nomination to final approval. In addition, the module will centrally store the history of nominations and awards for all LE Staff. GoMBC is also capable of adding US Direct Hires (USDH) in group awards. Administrators will be able to generate reports of previous nominations and awards.

MBC is a global policy (ALDAC: 19 STATE 53476) and affects all Department of State LE staff members worldwide.

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

Employee ID

Employee Name

Employee Work Email

Employee Information: Position title, Grade, Date of hire, Post, section, and agency

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

- 22 U.S.C. 2651a (Organization of the Department of State)
- 22 U.S.C. 2581 (General Authority of Secretary of State)
- 22 U.S.C. 3901 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 13478 (Amendments to Executive Order 9397 Relating to Federal Agency Use of Social Security Numbers)
- Executive Order 9830 (Amending the Civil Service Rules and Providing for Federal Personnel Administration)
- Executive Order 13478 (Amendments to Executive Order 9397 Relating to Federal Agency Use of Social Security Numbers)

- Executive Order 9830 (Amending the Civil Service Rules and Providing for Federal Personnel Administration)

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

☒ 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](mailto: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](mailto:records@state.gov))

If yes provide (Consolidate as much as possible):

- Schedule number (e.g., (XX-587-XX-XXX)):  
A-03-002-16
- Disposition Authority Number:  
DAA-GRS-2017-0007-0003 (GRS 2.2, item 030)
- Length of time the information is retained in the system:  
Temporary. Destroy when 2 years old or 2 years after award is approved or disapproved, whichever is later, but longer retention is authorized if required for business use.
- Type of information retained in the system:  
PII including Name and Employee ID.

**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?**

Global Talent Management's (GTM) Overseas Personnel System (OPS) continuous data feed updates GoMBC with LE Staff's PII. If the LE Staff's PII in GoMBC and the information in OPS do not match, OPS initiates an automatic update to reflect the changes. Locally Employed Staff are also able to manually provide additional information that is not contained in OPS such as reviews and MBC performance.

US Direct Hires (USDH) PII does not come from OPS. USDH enter information in GoMBC by filling out PII in a series of screens that constitute an in-app Nomination for Award form. This information is for USDH supervisors or for employees that are included in group awards, however, the only information about USDHs is name, email, position title, and post.

Any data updated in GoMBC will also automatically update connecting modules (such as OAS).

**(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.

This system runs in the FEDRAMP Microsoft Azure Commercial Cloud. The system is built on Microsoft Azure as a Platform Service (PaaS) and is accessible to users via

the internet. GoMBC is fully contained within the Azure PaaS; the physical and network infrastructure is not managed or operated by Department GoMBC personnel.

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

- OPS continuously feed updates to GoMBC for LE Staff. Their information can be validated in that system.
- It is the responsibility of the USDH to provide accurate information on the in-app Nomination for Award form.

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

Yes, the information in this system is current through automatic updates from OPS or HR review. OPS continuous data feed updates into GoMBC for LE Staff. If the information in GoMBC and the information in OPS do not match, OPS initiates an automatic update to reflect the changes.

Also, it is the HR administrator's responsibility to log into GoMBC or OPS and keep the post's information current. This includes individual employee's information at post. Individuals cannot make additional changes to their information after submitting their information in the in-app form.

Any information entered by a USDH is current for the nomination for award that they have submitted. There is no need to keep the information current as they will re-enter their information in any subsequent nomination for award.

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

No, the system does not use any information from commercial sources nor is the information in the system publicly available.

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

No other information is collected apart from what's necessary for the business requirements of GoMBC and awards processing.

## **5. Use of information**

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

The PII in GoMBC is used so that LE staff in all agencies under Chief of Mission can manage their profile and complete performance management documentation (annual work plan (AWP), mid-year discussion, and Employee Performance Reports (EPR)). The AWP is the basis for the EPR which is finalized by rating and reviewing supervisors at

the end of the rating cycle allowing HR service providers to utilize the EPR outcome to calculate associated MBC rewards.

The USDH PII is used for supervisors to perform their GoMBC related duties and for USDH employees in group awards to be processed within the system.

**(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 purpose of this system is to track and manage Locally Employed (LE) staff performance management and Merit Based Compensation (MBC) reward, USDH employees involved in group awards, and to allow supervisors to perform their GoMBC related duties. All the PII is stored within the system for processing purposes. The PII collected is necessary and only kept so that the system can perform the functions that it was designed to do. No collateral uses exist for the information collected by the system.

**(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.

## **6. Sharing of PII**

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

Internal:

All PII listed in 3d will be shared with OPS which is housed in Global Talent Management (GTM).

External:

GoMBC does not share PII externally.

**(b) What information will be shared?**

Internal:

All the PII listed in 3d will be shared with OPS.

External:

N/A

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

Internal:

The purpose of sharing the PII is to facilitate the review of the nominations for awards and to generate the personnel actions for the approved awards.

External:

N/A

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

Internal:

All PII is sent via Application Programming Interface (API) Azure ServiceBus directly to OPS. The connection is through bi-directional network traffic.

External:

N/A

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

Internal:

Data from GoMBC and its modules is sent to OPS via an API which is secured by Microsoft Azure Security controls and HTTPS Security provided by Azure Cloud Storage.

External:

N/A

**7. Redress and Notification**

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

Since LE Staff PII is pulled from OPS, no notice is provided to those record subjects.

Prior to collection of USDH information within the in-app Notification for Award form, a Privacy Act Statement (PAS) is shown. This PAS provides the direct hire with notice of what authorizes the Department to collect this information and why the information is being collected. It also provides the applicant with information pertaining to the System of Records Notice (SORN) STATE-31.

**(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?

USDH are notified of their opportunity to decline to provide their PII via the Privacy Act Statement that appears prior to the collection of information within the in-app Notification for Award form.

For information pulled from OPS, LE Staff are not able to consent to particular uses, nor decline to provide the PII.

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

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

USDH and LE Staff are able to access their information by logging into the system. They can only access and correct their information prior to submission of an award. Any PII received from OPS cannot be edited within the GoMBC.

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

☒Yes ☐No

If yes, explain the procedures.

USDH and LE Staff can access and correct their information prior to submission of an award. Once the nomination is submitted, it is no longer accessible to the individual for editing or correction. At this point, HR post admins may manually change inaccurate or erroneous information of accounts that have been created in the system. This process begins when a record subject calls or e-mails HR, or HR detects the error and corrects in-app. These corrections are made for nominations and are not possible within OPS. Any PII received from OPS cannot be edited within the GoMBC System.

If no, explain why not.

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

Individuals are notified of the procedures to correct their information during user training with Human Resources offices at post and through system help information found on the site. If a user sees that PII is incorrect, they will contact HR and HR is responsible for updating. There is virtual training provided for the deployment. After this initial deployment, HR at post is responsible for the training program. It is up to post how this is conducted.

## **8. Security Controls**

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

Azure (FedRamp Cloud) uses Transparent Data Encryption (TDE) which encrypts the databases, backups, and logs at rest without any changes to your application. TDE does real-time I/O encryption and it's secured by a certificate that the server master database stores by an asymmetric key. Information is sent by Secure Sockets Layer (SSL). Furthermore, only administrators with a "need to know" have rights to the system.

**(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).**

Role	Function and Rights
System Administrator	The System Administrator is responsible for managing the system and its roles. The system administrator will define rights, system troubleshooting, and run audits adding designated trusted individuals as Mission Administrators according to individual bureau and post requirements. This role has access to name, email address, Mission/Post/Section, job title, USDH Supervisor, grade (LES only, Entry of Duty date (LES only), and history of previously received awards.
Service Providers	
Global Report Manager	The Global Report Managers role is to generate reports on all missions and for individual posts. This role has access to all PII listed in 3d.
Mission Administrator	The Mission Administrator role can: <ul style="list-style-type: none"> <li>• Sign in on behalf of a user</li> <li>• Approve and change the status or score of a review</li> </ul>

	<ul style="list-style-type: none"> <li>• Generate all reports</li> <li>• Assign Mission managers and Compensation admins</li> <li>• Update an employee's official name in the system</li> <li>• Delete comments</li> <li>• Review history of all LES</li> </ul> <p>A Mission Administrator has access to name, email, and grade.</p>
Mission Compensation Administrator	The Mission Compensation Administrator role can define the reward determination calculation profile (formula for determining rewards) and perform/review rewards calculations. They have access to name, Employee ID, grade, and annual salary.
Mission Manager	<p>Mission Managers are US direct hires (USDH) or locally employed (LE) staff members who manage their post's settings, team structure, and review status.</p> <p>The Mission Manager role can:</p> <ul style="list-style-type: none"> <li>• Edit Mission structure data (review periods, pools, etc.)</li> <li>• Change the status of a review</li> <li>• Define the hierarchy of the Mission pool structure</li> <li>• Generate all reports</li> </ul> <p>The Mission Manager has access to all PII listed in 3d.</p>
Mission Reports Manager	Mission Reports Managers are US direct hires (USDH) or locally employed (LE) staff members with a read only role who can generate Mission-wide reports and reports for individual posts. They have access to all PII for their mission.
User (Employee)	Users are any locally employed (LE) staff member who has access to GoMBC and is part of a rater's team. The Users role can view and acknowledge their Annual Work Plan, mid-Year discussion, and current/previous reviews. A user only has access to their own PII and review history.
Rating Supervisor (Rater)	Raters are locally employed (LE) staff members or U.S. Direct Hires (USDH) who supervise a team. The Raters role manages a list of employees and creates Annual Work Plans and Reviews (if assigned). The rater has access to the following PII: name, email address of subordinate employees, grade, review history (while supervisor of these employees)

Reviewing Supervisor (Reviewer)	Reviewers are locally employed (LE) staff members or US direct hires (USDH) who supervise Raters and who endorse reviews for one or more employees. The Reviewer can endorse or return reviews. They have access to the name, email address, and grade of LES employees for whom designated as a reviewer.
Pool Supervisor	<p>Pool Supervisors are US direct hires (USDH) who endorse reviews for one or more employees. The Pool Supervisor role can:</p> <ul style="list-style-type: none"> <li>• Endorse or return reviews</li> <li>• Endorse or reject changes to pool</li> </ul> <p>A pool supervisor has access to name, email address, and grade of LES employees for whom designated as a pool supervisor.</p>
Training User	<p>The Training User is assigned to a test Mission to practice being a Mission Administrator.</p> <p>The Training User manages post settings, team structures, and review statuses. They do not have access to PII. The data in a Training mission is fictitious and does not relate to real employees (i.e. John Doe, Jane Doe)</p>
System Auditor (Auditor)	The Auditor role will have full access to the audit logs of all activities performed by users and the account access logs. The System Auditor has the ability to review activity and account logs to validate system access control. This role does not have access to PII.
Overseas Award System (OAS) module roles and permissions	
Nominator	The Nominator can create, submit, edit, and save a nomination along with viewing the status (ie., submitted to HR, pending Joint Country Awards Committee - JCAC) of nominations they submitted (submitted nomination is read-only unless returned for editing). A nominator has access to name, email address, Mission/Post/Section, Job Title, and USDH Supervisor.
Nominee	The nominee is the recipient of an individual or group nomination. This role can view their own archived nominations. They only have access to their personal PII.
USDH Supervisor	<p>The USDH Supervisor is the first level of approval of a submitted nomination.</p> <p>The USDH Supervisor can view, return, and approve/reject a NEW nomination of a nominee under his/her supervision hierarchy. They have access to name, Post/Section, and job title.</p>

LE Staff Supervisor	<p>The LE Staff Supervisor can:</p> <ul style="list-style-type: none"> <li>• View submitted nominations for employee(s) under his/her supervision</li> <li>• View nomination(s) of any employee under his/her supervision hierarchy.</li> </ul> <p>This role has access to name, Post/Section, and job title.</p>
LE Staff and USDH HR Awards Coordinator	<p>The LE Staff HR Awards Coordinator oversees the entire nominations process, returns the nominations to previous levels for corrections, forwards nominations to next levels for approvals, generates reports to assure correctness, initiates communication or discussion and acts according to the outcome.</p> <p>The Awards Coordinator can:</p> <ul style="list-style-type: none"> <li>• View all nominations and their status after submission.</li> <li>• Edit, return, unlock, and take other necessary actions for a nomination</li> <li>• Manage and edit Mission profile</li> <li>• Manage and edit employee registrations (including setting up employee supervisory structure, grades, titles, etc).</li> <li>• Assign roles (except awards coordinator role)</li> <li>• View historical data and provide information to USDH and LE Staff Supervisors for their supervisees</li> <li>• Impersonate any role except JCAC chair, post budget officer, and Chief of Mission (COM.)</li> </ul> <p>This role has access to name, email address, Mission/Post/Section, job title, name, and title of USDH Supervisor, grade (LES only), Entry of Duty date (LES only).</p>
Joint Country Awards Committee (JCAC) Member	<p>As voting member of the Joint Country Awards Committee (JCAC), this role can:</p> <ul style="list-style-type: none"> <li>• Access, view, comment, and vote on the nominations and cast/change their own votes (approve, disapprove, recuse, or hold).</li> <li>• View other members' votes and comments during and after voting</li> <li>• View status of all nominations</li> <li>• Run/view certain reports on nominations.</li> </ul> <p>This role has access to name, position title, grade and Entry of Duty date.</p>
JCAC Chairperson (USDH)	<p>The USDH JCAC Chairperson endorses the JCAC Committee voting. If JCAC members voting results in a tie, JCAC Chair votes to resolve the tie. They have the same permissions and responsibilities as JCAC members with following exceptions:</p> <ul style="list-style-type: none"> <li>• Post may designate in Mission profile that chair only votes as tiebreaker</li> </ul>

	<ul style="list-style-type: none"> <li>JCAC chair can change award amount and/or award type and resubmit for members' votes</li> <li>Signs off on JCAC recommendation</li> <li>Can assign proxy members to vote in their stead</li> </ul> <p>This role has access to name, position title, grade and Entry of Duty date.</p>
COM/DCM (USDH)	<p>The COM/DCM can:</p> <ul style="list-style-type: none"> <li>Endorse or Reject nominations</li> <li>Access and view nominations and take any actions taken with respect to nominations.</li> <li>View status of nomination</li> <li>Run reports</li> <li>Change award type and amount</li> <li>Overwrite JCAC decision and comment</li> <li>Return nominations to HR</li> <li>Assign proxy</li> </ul> <p>This role has access to name, position title, grade, and Entry of Duty date.</p>
Other (Non-State) Agency Official (USDH)	<p>The Non-State Agency Official role can view and approve award nominations submitted through the Awards process flow (Management) for which they have received final approval authority contingent on funds availability/post budget officer approval. This role has access to name, position title, grade, and Entry of Duty date.</p>
Financial Management (FM) Group	<p>Individuals in the FM Group can:</p> <ul style="list-style-type: none"> <li>Assign fund cite, which is the funding source for the award</li> <li>Can input the fund cite for the nominees in his/her agencies</li> <li>View nominations and input funding data for their own agency/agency they have FM responsibility</li> <li>Make comments relating to nomination funding for the PBO</li> </ul> <p>This role has access to name, job title, and post/section.</p>
Financial Management Officer (FMO) (USDH)	<p>The FMO role can</p> <ul style="list-style-type: none"> <li>Confirm correct funds allocation</li> <li>Approves funding string and award amount</li> <li>View nominations and approve funding data for their own agency/agency they have FM responsibility for only</li> <li>Assign proxy to make decisions in their stead</li> </ul>

	<ul style="list-style-type: none"> <li>• Make comments relating to nomination funding</li> </ul> <p>This role has access to name, job title, and post/section.</p>
OE Global Role	The OE Global role has the same functions as USDH Awards Coordinator for all posts globally. This role has access to name, email address, Mission/Post/Section, job title, USDH Supervisor, grade (LES only), Entry of Duty date (LES only) and history of previously received awards.
Bureau Regional Role	The Bureau Regional role has the same functions as USDH Awards Coordinator for all posts in their region. This role has access to name, email address, Mission/Post/Section, job title, USDH Supervisor, Grade (LES only), Entry of Duty date (LES only) and history of previously received awards.

**(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 designated end users are responsible for using the system in accordance with GoMBC and Awards policy and broader Department guidelines. All end users will be required to use OKTA Multi-factor Authentication (MFA). The ADG team defines a security model that allows for Role Based Access Control (RBAC), discussed in detail in the GoMBC and Awards SSP. This design enables delegation of access in accordance with need-to-know and least privilege policies to each designated end user community based on location assignment. The roles also have different access levels based on organization entity (Pool, Post, Mission or Bureau) to prevent access to data outside of an individual’s Organization Entity. This span of control for an Organization Entity includes Organization Entities within it (e.g. posts within a mission).

Logs of individuals given access to GoMBC are maintained by the Mission Administrator. Mission Administrators will be responsible for removing permissions of users who no longer have a need to access the GoMBC. Account access logs will be reviewed bi-annually by the ADG ISSO or the Project Compliance SME.

Privileged accounts to include those in the Service Provider group and System Administrators are reviewed on at least a bi-annual basis by the ISSO or the Project Compliance SME to ensure that the appropriate users have access and that accounts no longer in use are disabled. GoMBC follows a policy wherein any GoMBC user access can be disabled after 90 days of idleness.

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

A user will complete registration or be registered by Post Administrator for access to the system. If they are not already an OKTA account holder, then they will first need to request and receive approval for an account. Once a user is authenticated, they then complete registration for system access within GoMBC.

The system administrator is a global role that assigns roles to Mission administrators. Mission administrators assign all other roles as necessary. The Mission administrators' abilities to assign roles are limited to their own Post or Mission. Mission administrators are often HROs and/or HR LES Coordinators at Post. An administrator with the appropriate rights approves all accounts in the system.

Awards is accessible to employees with official US government accounts that have been granted a State Okta account. All state.gov account holders automatically have a State Okta account. Following successful MFA (Multi Factor Authentication) performed by SE-ICAM OKTA, the individual gains access to Awards only if the employee's record has already been either received from OPS or manually entered in Awards by an authorized HR Administrator.

Access to data in the system is determined by the user's role assignment via Roles-Based Access Control (RBAC). Users with no administrative privileges can only access data assigned to them (their own data, and data of their employees and supervisors as assigned by the Mission Administrator). Users with administrative privileges (e.g., Mission Managers, Mission Administrators, System Administrators) can access all data within the Organization Entity that they are assigned to.

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

To prevent the misuse of information there are standard NIST security controls in place for auditing the transactions in this system. Monitoring tools including system logs are used, and system processing exceptions (errors) are recorded for analysis.

**(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.**

For all users of the Department of State OpenNet, privacy training is included in the annual Cyber Security Awareness training (PS800) in addition to the mandatory privacy training via the Foreign Service Institute (FSI) biennial course "PA-318 Protecting Personally Identifiable Information".