

Privacy Impact Assessment for

USAJOBS

July 8, 2020

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Abstract

USAJOBS® is the Federal Government's official employment site and serves as the central location for job seekers to find job openings within hundreds of federal agencies and organizations across the United States and around the world. Federal agencies use USAJOBS® to facilitate their hiring processes and match qualified applicants to job openings. It is housed within the Office of Personnel Management's Human Resources Solution organization and provides job seekers the ability to create profiles and advertise their resumes, store supplemental documentation to be used in the application process, search for government jobs and career information, and apply for a job online. This Privacy Impact Assessment is being conducted because USAJOBS collects, maintains and disseminates personally identifiable information about job applicants.

Overview

Housed within the Office of Personnel Management's (OPM) Human Resources Solutions organization (HRS), USAJOBS® is the Federal Government's official employment site and serves as the central location for job seekers to find job openings within hundreds of federal agencies and organizations across the United States and around the world. It supports authorized federal agency human resources (HR) professionals, hiring managers, and recruiters in creating and advertising government jobs, sourcing candidates for employment consideration, and managing the applicant relationship process. In so doing, USAJOBS delivers the service by which federal agencies meet their legal obligation to provide public notice of federal employment opportunities in the competitive service to federal employees and the public.

In addition, USAJOBS® provides job seekers with the ability to create profiles and advertise their resumes, store supplemental documentation to be used in the application process, search for government jobs and career

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information, and apply for a job online. Information about job seekers, career opportunities, and events is collected, stored, processed, and transmitted to support a web-enabled federal recruitment and hiring processes. Historical employment details for announcements (without personally identifiable information) and applicant volume are stored to identify trends and workforce planning data for agency and government-wide reporting.

USAJOBS is comprised of two applications: the Federal Career Portal and the Agency Talent Portal. The Federal Career Portal, supported with a federal infrastructure and by federal employees, is a centralized secure platform that acts as a federal recruitment portal for all government positions, whether competitively or non-competitively sourced. The Portal offers candidates both a job board and a centralized secure profile which they may make searchable and use to store their application documentation such as transcripts, resumes, SF-50s, DD-214s, and other documents.

The key aspects of the job seeker and applicant experience that are encompassed in the Federal Job Portal are:

Applicant Profile and Resume: USAJOBS delivers personalized content and career opportunity recommendations based upon an applicant's eligibility and search preferences; including desired location, travel and relocation preference, appointment type, and work schedule. When logged in, job seekers can use these preferences to customize their search results for a more personalized experience, but also have the option to toggle those preferences off. As part of this effort, USAJOBS collects user profile data and resumes to assist candidates with their search for career opportunities. The provision of documents, such as resumes, transcripts, cover letters, and other employment history supporting documents, is voluntary; document requirements vary based on the job opportunity announcement specifications but are not required to create a profile. Candidates may create a USAJOBS builder resume in lieu of uploading a resume. Builder resumes

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include the standard employment history information, such as employers, job duties, contact information, skills, and accomplishments.

At the point when candidates create an application, the candidate is transferred to a talent acquisition system where additional job opportunity announcement information is used, including Vacancy Identification Number, Title of Job, and Geographic Availability. Upon transfer to the talent acquisition system, USAJOBS maintains a record of the USAJOBS profile information, resume, and additional documentation.

This data may also be shared with the hiring agency to determine eligibility and qualifications within the hiring process, either by an individual applying to federal positions or agencies finding searchable profiles/resumes through the Agency Talent Portal. The job seekers/applicants have full control over their profiles and any associated documents that they store in USAJOBS and submit with each application.

Job Opportunity Announcement: The Job Opportunity Announcement (JOA), or a federal job posting, is provided by an agency through the Staffing Integration Framework (SIF), a defined set of data standards for integration into USAJOBS, from their talent acquisition systems (TAS).

Search: Individual job seekers can search USAJOBS to find relevant content and job matches, including determining one's eligibility to apply to the announcement using hiring paths. Hiring paths exist for individuals with disabilities, military spouses, students and recent grads, veterans, and Peace Corps and VISTA Alumni, as well as other groups. They help job seekers determine their eligibility for all competitive and special non-competitive hiring authorities for which they may be considered. By increasing the visibility of hiring paths during the search process, USAJOBS connects appropriate applicants with all opportunities available to them and reduces the number of ineligible applicants applying to a particular federal job.

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Application: Applicants use USAJOBS as the central integration point when applying for jobs using and reusing their resumes and other documentation across multiple hiring systems and job applications. After finding jobs they are interested in, applicants are able to select to apply to those jobs and select which resumes and additional documentation they would like to attach to their application, and then transfer over to the talent acquisition system used by the agency they are applying to. USAJOBS then collects and displays to the job seeker their application status updates for each job they've applied for from the relevant agencies.

Customer Satisfaction: USAJOBS gathers customer satisfaction data from individuals regarding the USAJOBS system and the federal hiring process. This information is used by the USAJOBS Program Office to improve the tools and processes job seekers and applicants use to apply for federal employment.

The Agency Talent Portal (ATP) allows agency users to collaborate within a recruitment workspace to mine searchable job seekers who are eligible and could be well suited for their job opportunities. By offering strategic tools that work in parallel with agencies and job seekers, we are increasing the ability to connect these groups, reducing wasted time and increasing the match quality.

Agencies can search for job seekers who opt-in to share their resumes and have desired skills and experience and invite them to apply for relevant job postings. The ATP operates to augment federal recruitment by making opt-in job seeker profile and resume data discoverable to recruiters and HR specialists. Within the secure ATP interface, users can query job seeker profiles and resumes by keywords (such as skills and certifications), eligibilities, and location. Recruiters can then share job opportunity announcements or event invitations with job seekers. To create an ATP account, federal employees and approved contractors are required to provide the agency they work for, their federal email address, phone number, and name.



Section 1.0. Authorities and Other Requirements

1.1. What specific legal authorities and/or agreements permit and define the collection of information by the project in question?

USAJOBS' authorities to collect and disseminate applicant information to support the recruitment and hiring process include: 5 USC § 3327; 5 USC § 3330; Presidential Memorandum - May 11, 2010 "Improving the Federal Recruitment and Hiring Process;" Executive Order – Nov. 9, 2009 "Employment of Veterans in the Federal Government;" and Executive Order – 13162- July 6, 2000 "Federal Career Intern Program."

1.2. What Privacy Act System of Records Notice(s) (SORN(s)) apply to the information?

The Privacy Act Systems of Records Notices applicable to the information in USAJOBS are OPM /GOVT-5 Recruiting, Examining, and Placement Records, and OPM / GOVT-7 Applicant Race, Sex, National Origin, and Disability Status Records.

1.3. Has a system security plan been completed for the information system(s) supporting the project?

Yes. A system security plan was completed in connection with the system's Authority to Operate (ATO). It is updated at least annually and signed by the system owner to acknowledge the updates and edits.

1.4. Does a records retention schedule approved by the National Archives and Records Administration (NARA) exist?

Yes. The records schedule number for USAJOBS is DAA-0478-2014-0006.

1.5. If the information is covered by the Paperwork Reduction Act (PRA), provide the OMB Control number and the agency number for the collection. If there are multiple forms, include a list in an appendix.

OMB Control Number 3206-0219 has been established for the USAJOBS Profile and Resume Builder. Other common forms collected as a part of the supporting documentation include:



Form	Name	Control No.
OF 306	Declaration of Federal Employment	OMB No. 3206- 0182
SF 15	Application for 10-Point Veteran Preference	OMB No. 3206- 0001
DD	Certificate of Release or Discharge from	PRA does not
214	Active Duty	apply
SF-50	Notification of Personnel Action	PRA does not apply
N/A	ForeSee Customer Satisfaction Survey	OMB No. 1090- 0008

Section 2.0. Characterization of the Information

2.1. Identify the information the project collects, uses, disseminates, or maintains.

USAJOBS collects information about individual candidates seeking jobs with the Federal government. This information includes name, contact information (email address, mailing address, telephone number) demographic information, hiring preferences, occupational specialties and certifications, current employment information, and disability status. In addition, USAJOBS collects candidates' resumes, transcripts, veterans' documentation, employment records, and eligibility information for a particular position, such as information about past Federal employment, citizenship, and veteran's status. All other information collected by USAJOBS is deemed optional and will vary by candidate preferences, and this information is not limited by the USAJOBS system. The content of the



document can include information that may or may not have been requested by OPM or any agency requirements.

Demographic information for the job seeker such as race, gender, national origin may be collected and stored. This collection of demographic data is optional and only occurs at the discretion of the job seeker. It is optionally collected and transmitted at the time of application to the hiring agency.

2.2. What are the sources of the information and how is the information collected for the project?

Information is collected directly from the individual via the USAJOBS online interface, which may include connecting to an application programming interface (API) to provide authoritative information. When APIs are used, that information is provided by the connected system, but the user can determine if the information is accurate, and if they would like to add it to their profile. The user completes and submits their information voluntarily using any internet browser. Within the application process, users may also choose to include their demographic information, and/or upload resumes and other supporting documentation.

2.3. Does the project use information from commercial sources or publicly available data? If so, explain why and how this information is used.

USAJOBS does not use any commercial or publicly available data unless the individual chooses to input information into the only interface.

2.4. Discuss how accuracy of the data is ensured.

As data is collected in the system, accuracy is enabled by a combination of field restrictions and user confirmation but USAJOBS does not independently verify that the information an individual provides is accurate. Field restrictions are when the system only allows users to enter data that has certain restrictions, such as choosing a valid United States state name from a list or limiting announcement fields to the number of characters that can display on USAJOBS. User confirmation is when the system will ask the user



to validate that the data that they have entered is accurate, or data that has been returned from an API, before they can proceed to other sections. USAJOBs does not independently verify the information provided by individual job seekers.

2.5. Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: There is a risk that USAJOBS may unknowingly collect inaccurate or falsified information from and applicant, resulting in incorrect hiring decisions.

Mitigation: This risk is mitigated via a variety of measures though cannot be fully mitigated within USAJOBS because the information provided by individuals is not validated in the system. USAJOBS uses field restrictions so that candidates may enter information in a specified format, reducing the chance for errors. In addition, the system employs user confirmation, in which USAJOBS asks the user to validate that the information entered is accurate before it is submitted. Generally, job seekers have an interest in ensuring that the information they provide is accurate and USAJOBS does not otherwise validate the information that is collected from the user. The risk that applicants will provide falsified information in an effort to obtain more favorable hiring decisions is mitigated by providing them with notice that they must provide complete and truthful information and that to knowingly provide false information or conceal a material fact is a violation of 18 U.S.C. § 1001 and may result in fines and/or up to five (5) years imprisonment.

Privacy Risk: There is a risk that USAJOBS may collect more information than is necessary to meet the business purpose of the system.

Mitigation: This risk is not fully mitigated because individual applicants are permitted to upload information that may not have been requested by USAJOBS or a particular agency's job announcement. USAJOBS makes every effort to mitigate this risk by, for example, allowing agencies to modify the



customized information requests such that only information relevant to a specific application is being collected. Additionally, applicants are notified as to whether requested information is required or optional.

Privacy Risk: There is a risk that the information in the system may be outdated or inaccurate, adversely impacting a job applicant's success and system utility.

Mitigation: This risk is mainly mitigated by providing job seekers with direct access to their information in USAJOBS so that they can update their information to ensure it is accurate, and relevant. The accuracy of the information, however, is dependent upon the individual and USAJOBS provides prompts and requires individuals to certify to the accuracy and completeness of their information at the time they apply to a job opening.

Section 3.0. Uses of the Information

3.1. Describe how and why the project uses the information.

The candidate information that is collected and maintained in USAJOBS is used to make decisions regarding an individual's suitability, eligibility, and qualification for a particular federal job and for human resources offices to refer qualified candidates to hiring officials.

The demographic information that job seekers can voluntarily provide may be used to support Equal Employment Opportunity Commission reporting by federal agencies. Talent Acquisition Systems separate this demographic data from the individual application and only use it in the aggregate for reporting purposes.

When starting an application, candidates are presented a "How Did You Hear About This Job" survey. This information is disseminated as part of the candidates' application package to agencies. USAJOBS retains this information for aggregated, statistical analysis.



When a job seeker opts to make their resume searchable, certain data is made available in the Agency Talent Portal. ATP uses candidate information from USAJOBS to present resume mining results to ATP users. If a job seeker makes their resume and profile not searchable in the future, their information is no longer viewable in ATP.

3.2. Does the project use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly? If so, state how OPM plans to use such results.

Both the Federal Career Portal and the Agency Talent Portal have search features that allow job seekers (in the Federal Career Portal) and agency staff (in the Agency Talent Portal) to query by keywords and geographic location. Neither of these features are used to discover or locate predictive patterns or anomalies.

3.3. Are there other programs or offices with assigned roles and responsibilities within the system?

Within OPM, only USAJOBS program staff have assigned roles and responsibilities within the USAJOBS system. USAJOBS program staff include both HRS and OCIO personnel.

USAJOBS maintains several interconnections with talent acquisition systems (TAS), provided by OPM, external agencies, and vendors, as well as agency APIs where appropriate. USAJOBS receives job opportunity announcements from TAS's and shares job seeker profiles and documents with those TAS's upon the job seeker initiating an application submission. TAS's also share application status notifications with USAJOBS. These interconnections are managed by the Staffing Integration Framework, Memorandum of Understandings (between agencies), and ISA's (between Talent Acquisition Systems).



3.4. Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: There is a risk that unauthorized individuals may access the information in USAJOBS and use it for an unauthorized purpose or that authorized users will access the information for unauthorized purposes.

Mitigation: The risk of unauthorized individuals gaining access is mitigated through USAJOBS by only allowing access to job seeker accounts through multi-factor authentication through the use of login.gov.

The risk of authorized users accessing the information for unauthorized purposes is mitigated through access controls that restrict the ability to retrieve data, based on authorization and access permissions built into the system. The system maintains access roles that restrict and grant access to information and functionality to support the business process needs of federal HR professionals. As outlined in section 8.1, audits are conducted on usage of the system.

Privacy Risk: Through the Agency Talent Portal, there is risk of PII being used outside of the scope of the purpose for which the initial collection was made.

Mitigation: This risk is mitigated by providing access only to authorized and registered users of USAJOBS. Users of USAJOBS are informed of appropriate uses of PII upon authorization to the system and all users are trained on the appropriate use of PII ensuring that those responsible for administering and operating the system use PII appropriately.

Privacy Risk: Through the Agency Talent Portal, there is a risk of sharing information that may be printed with other parts of the user's agency without tracking where the information is sent.

Mitigation: This risk is mitigated by providing access through controls built into USAJOBS to allow authorized and registered agency users. Users are presented with and must agree to rules of behavior on an annual basis.



These rules assign responsibility for sharing information with others not involved in the hiring processes.

Section 4.0. Notice

4.1. How does the project provide individuals notice prior to the collection of information? If notice is not provided, explain why not.

The system and program provide notices with a Privacy Policy, Full Terms and Conditions of Use, and Rules of Behavior which are presented to every user on USAJOBS.

USAJOBS users are also presented with a link to the Privacy Act Statement located on the header of the registration and authenticated pages as well as a link to the Privacy Policy on the footer of every page within the internet application.

In the case where USAJOBS collets information from an API, a notice is provided prior to connecting to the API to explain what information will be retrieved.

4.2. What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project?

When creating their account in login.gov, users consent to the "Security Practices and Privacy Act Statement" provided by GSA. This includes unconditional consent to review, monitor, record, audit, and act by all authorized government and law enforcement personnel. When entering information directly into USAJOBS, the user is able to determine which information to add and can also delete that information if desired. When information is retrieved through an API, the user is presented the information that was retrieved, and given the option to add the information to their profile or decline. For job opportunity announcements that require online assessments, the user will be informed that information will be shared



with the vendor hosted system. Applicants may choose to not apply based on this information.

4.3. Privacy Impact Analysis: Related to Notice

Privacy Risk: There is risk that individual will not receive adequate notice concerning why their information is being collected and how it will be used.

Mitigation: USAJOBS mitigates this risk by requiring Full Terms and Conditions of Use consent upon sign in and providing access to the USAJOBS Privacy Policy on every webpage within the system. The risk is mitigated at the point of collection when individuals are provided with Privacy Act statements that inform them of the human resources purposes for which their information is being collected and through the publication of the SORN and this PIA.

Section 5.0. Data Retention by the Project

5.1. Explain how long and for what reason the information is retained.

USAJOBS' planned scheduling retains individual-level data, including PII and web analytics, for three (3) years after the users last login date. After three years, individual-level data is anonymized and aggregated for statistical purposes. Statistical data is retained indefinitely to track USAJOBS program performance and improvements.

Job seekers can request to have their profile and document data deleted, at which time their data is removed from production systems and archived for the remainder of the three-year data retention period.

Job seekers can voluntarily opt-in to making their profile and a single resume searchable for a period of eighteen (18) months which creates a record in ATP. After this period has elapsed, the profile and resume are removed from the searchable index until a user opts-in again.



5.2. Privacy Impact Analysis: Related to Retention

Privacy Risk: There is risk that the information in USAJOBS will be retained for longer than is necessary to fulfill the business need for the information.

Mitigation: This risk is mitigated by adhering to the applicable records schedule and removing information three (3) years after the user's last login date.

Section 6.0. Information Sharing

6.1. Is information shared outside of OPM as part of the normal agency operations? If so, identify the organization(s) and how the information is accessed and how it is to be used.

All user information that individuals provide to USAJOBS to apply to job announcements is shared with the relevant customer federal agencies, via a connection with their respective talent acquisition systems (TASs). The customer agency uses the information to evaluate candidates for the federal job opportunity announcements for which they have applied.

6.2. Describe how the external sharing noted in 6.1 is compatible with the SORN noted in 1.2.

Any disclosure of information outside of OPM is done only consistent with the Privacy Act, such as pursuant to an applicable routine use in the relevant SORN identified in Section 1.2. In particular, USAJOBS provides access to applicant information to appropriate agency users consistent with the purposes for which that information was collected. For example, pursuant to the OPM /GOVT-5 Recruiting, Examining, and Placement Records, the records are intended to be "used in considering individuals who have applied for positions in the federal service by making determinations of qualifications . . . for positions applied for, and to rate and rank applicants applying for the same or similar positions. They are also used to refer candidates to federal agencies for employment consideration, including appointment, transfer, reinstatement, reassignment, or promotion."



Likewise, applicant demographic information is provided to customer agencies only with the consent of the individual applicant for the purpose set forth in the OPM / GOVT-7 Applicant Race, Sex, National Origin, and Disability Status Records SORN, generally to evaluate at an aggregate level hiring methods, recruitment programs and to meet reporting obligations but in such a manner that "the individual's identification as to race, sex, national origin, or disability status does not accompany that individual's application nor is otherwise made known when the individual is under consideration by a selecting official."

6.3. Does the project place limitations on re-dissemination?

All customer agencies that receive information from USAJOBS are subject to the government-wide SORNs referenced in Section 1.2 and their use and disclosure of the information may only occur within the parameters of the Privacy Act and those SORNs. In addition, agencies are subject to the Rules of Behavior that outline appropriate handling and use of USAJOBS information.

Application submission data made available to TAS's are limited based on Interconnection Security Agreements (ISA) and Memorandums of Understanding (MOU).

6.4. Describe how the project maintains a record of any disclosures outside of OPM.

Records of requests for and disclosure of USAJOBS data can be obtained via the USAJOBS help desk at vendor-help@usajobs.gov, and the USAJOBS data analytics team obtains the information necessary to process those requests.

6.5. Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk that information will be disclosed and used for a purpose that is not consistent with the business purpose for which the information was initially collected.



Mitigation: This risk is mitigated by disclosing information only pursuant to the routine uses in the relevant SORNs or as otherwise permitted by the Privacy Act and by requiring agencies to adhere to the Rules of Behavior and other relevant requirements contained in inter-agency agreements. In particular, users are notified in the Rules of Behavior, agreed to annually, that that unauthorized use or acts to accrue resources for unauthorized purposes, or otherwise misuse this system are strictly prohibited.

Section 7.0. Redress

7.1. What are the procedures that allow individuals to access their information?

Individual job seekers are required to establish a login.gov account through the General Services Administration in order to develop a candidate profile, access and make changes to their own information, and apply for jobs. Once established, an individual can access their USAJOBS information through login.gov and are able to review and make changes to their information. When USAJOBS obtains information through an API, the individual must log into that additional system using that systems credentials.

Individuals may also request access to records that are covered by the SORNS referenced in Section 1.2 by following the process outlined.

7.2. What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?

Individual job seekers are required to establish a login.gov account through the General Services Administration in order to develop a candidate profile, access and make changes to their own information, and apply for jobs. Once established, an individual may update their profile information and delete or uploaded documentation at any time. When USAJOBS collects information through an API, the individual is given the option to re-connect to the API to pull the current information or can choose to override the



information and manually enter their data. In addition, most job vacancies list a point of contact and individuals may contact this agency representative and request changes to any of their information that is not accessible to them once the announcement has closed.

USAJOBS operates a Help Center that individuals may contact to request assistance with erroneous or inaccurate information.

More generally, Individuals may also request amendment to records that are covered by the SORNS referenced in Section 1.2 by following the process outlined.

7.3. How does the project notify individuals about the procedures for correcting their information?

Individuals are provided with notice regarding their information at the USAJOBS website, via instructions on establishing and maintaining their USAJOBS profile, the individual job announcements, and via access to the USAJOBS Help Center that can provide instruction on how to obtain assistance. Individuals also receive notice via this PIA and, generally, via the SORNS referenced in Section 1.2.

7.4. Privacy Impact Analysis: Related to Redress

Privacy Risk: There is a risk that individual users will not understand how they can access and amend their information.

Mitigation: This risk is mitigated through the notice and functionality described above, which provides individual users with the capability to update their information online via the USAJOBS website and other mechanisms.



Section 8.0. Auditing and Accountability

8.1. How does the project ensure that the information is used in accordance with stated practices in the PIA?

USAJOBS captures sufficient information in audit records to establish what events occurred, the sources of the events, and the outcomes of the events. USAJOBS personnel review and analyze application audit records for indications of inappropriate or unusual activity, investigate suspicious activity or suspected violations, report findings to appropriate officials, and take necessary actions. Additionally, administrative access to the systems is limited to individuals within the OPM CIO office only. These individuals are required to take IT administrator security training by OPM annually.

8.2. Describe what privacy training is provided to users either generally or specifically relevant to the project.

All OPM employees are required to take annual IT Security and Privacy Awareness Training In addition, every agency user is required to accept the systems Rules of Behavior which requires that they take the annual IT security and privacy training required by their agency. There are no role-based trainings currently required to use the system.

8.3. What procedures are in place to determine which users may access the information and how does the project determine who has access?

Individual job seekers are required to establish a login.gov account through the General Services Administration in order to establish an account, develop a candidate profile, access and make changes to their own information, and apply for jobs.

Federal agencies are provided access to USAJOBS through Inter-agency Agreements on an annual basis. Only authorized users may obtain privileged access to USAJOBS. The customer federal agency assigns rights and delegates access to the system to authorized agency staff and assumes all responsibility for the licensed users it provides access.



Contractors are allowed to use USAJOBS at their customer agency's discretion and subject to meeting security requirements.

8.4. How does the project review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within OPM and outside?

Federal agencies are granted access to USAJOBS via an annual Inter-agency Agreement (IAA) and Statement of Service agreement. Authorized agency personnel and the Program Manager sign a written agreement that contains the privacy and security policies for USAJOBS and the Rules of Behavior for all information types. Any new uses of the information or information sharing agreements will be evaluated by the USAJOBS program in consultation with the appropriate OPM stakeholders, to include the Office of the General Counsel, the Chief Privacy Officer, and the Chief Information Security Officer.

Responsible Officials

Michelle Earley
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Rhonda Wood HRS IT Program Manager

Approval Signature

Signed Copy on file with Chief Privacy Officer

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