

U.S. Nuclear Regulatory Commission Privacy Impact Assessment

Instructions: **Section A, B, C, and D must be completed for all systems. Section E must be completed if yes is the answer to Section B, questions 1 and 2.**

Date: 03/10/2006

A. GENERAL SYSTEM/APPLICATION INFORMATION

(See definitions at end of document)

1. Person completing this form:

Name	Title	Phone No.	Office
Beverly S. Holmes	Senior Program Analyst	301-415-6994	OCFO

2. System owner:

Name	Title	Phone No.	Office
Jesse L. Funches	Chief Financial Officer	301-415-7322	OCFO

3. What is the name of this system?

**Human Resources Management System (HRMS)
System Inventory ID: E-003**

4. Briefly describe the purpose of this system. What agency function does it support?

HRMS supports the collection and maintenance of general employee personnel records; employee time, attendance, and labor hour records; employee pay and compensation records, and employee training records.

5. Note below whether this Privacy Impact Assessment supports a proposed new system or a proposed modification to an existing system. **Not applicable. PIA is required for tri-annual certification and accreditation of the existing HRMS system.**

_____ New System

_____ Modify Existing System

B. PRIVACY ACT APPLICABILITY

1. Does this system collect, maintain, or disseminate personal information in identifiable form (e.g., name, social security number, date of birth, home address, etc.) about individuals ?

Yes X* No

*Employees.

2. If yes, will the data be retrieved by an individual's name or other personal identifier (e.g., social security number, badge number, etc.)?

Yes X No

If you answer yes to questions 1 and 2, complete Section E.

C. INFORMATION COLLECTION APPLICABILITY

1. Will the personal data be collected from or maintained by persons who are not Federal employees?

Yes No X

2. Will the data be collected from Federal contractors?

Yes X No

3. If the answer is yes to either question 1 or 2, will the data be collected from 10 or more persons during a calendar year?

Yes X No

4. If the answer is yes to question 3, is the information to be collected covered by an existing OMB clearance number?

Yes No X

If yes, indicate the clearance number, 3150-

D. RECORDS RETENTION AND DISPOSAL SCHEDULE APPLICABILITY

Does this system already have a NARA-approved records disposition schedule? (Reference NUREG-0910, "NRC Comprehensive Records Disposition Schedule," or contact your office Records Liaison Officer or Jeff Bartlett, OIS.)

Yes X

No

If yes, list the records schedule number

GRS 1-1.b-OPF	GRS 1-29.b	GRS 2-13.a	GRS 2-18
GRS 1-10	GRS 2-1.a	GRS 2-13.b	GRS 2-22.c
GRS 1-23.a(4)	GRS 2-1.b GRS 2-2	GRS 2-14.a	GRS 2-22.a
GRS 1-23.a(3)(a)	GRS 2-7	GRS 2-15.a	GRS 2-23.a
GRS 1-23.b(3)	GRS 2-8	GRS 2-15.b	GRS 20-3.a
GRS 1-23.b(2)(a)	GRS 2-9.b		

Complete Section E only if the answers to Section B, questions 1 and 2 are Yes.

E. SYSTEM DATA INFORMATION

1. *Type of information maintained in the system*

- a. Describe the information to be maintained in the system (e.g., financial, medical, training, personnel.) Give a detailed description of the data.

Personnel, Payroll, Financial, Training - general employee personnel records; employee time, attendance, and labor hour records; employee pay and compensation records, and employee training records

2. *Source of the data in this system*

- a. Are data being collected from the subject individual? If yes, what types of data are being collected?

Yes. Data collected includes: Social Security Numbers, employee names, address, health/life insurance options, beneficiary, time and attendance, training, and budget execution data.

- b. Are data on this individual being collected from other NRC files and databases for this system? If yes, identify the files and databases.

Yes. Project work assignments for employees are interfaced between the agency's enterprise project management system, Reactor Program System (RPS) and HRMS for labor hour data collection.

- c. Are data on this individual being collected from a source or sources other than the subject individual and NRC records? If yes, what is the source and what type of data is being collected?

Yes. Personnel data are collected in the Department of Interior's (DOI) Federal Personnel/Payroll System (FPPS) e-gov system and interfaced with HRMS to support training and time and labor system operations. Employee work assignment data in RPS are interfaced with HRMS to collect employee labor hours expenditures for resource and project management purposes. Labor cost information for the employee in the Cost Accounting System (CAS) are interfaced with HRMS for cost management. Employee fee billing data are indirectly interfaced with the license fee billing systems (FEES) and HRMS to support the agency's fee recovery process.

- d. How will data collected from sources other than the subject individual or NRC records be verified as current, accurate, and complete?

The data are accepted as accurate from known sources and the employee verifies the data upon receipt of an Earnings and Leave Statement or their NRC Form 52 for payroll and personnel transactions. Any discrepancies or problems with payroll or personnel data can be resolved by the NRC Personnel or DOI Payroll offices by discussing the discrepancy with the outside source and the subject employee. Time, attendance, and labor hour information is available to the employee online within the HRMS system and on their bi-weekly Summary Approval Report (i.e., the timecard).

3. *Attributes of the data*

- a. Are the *data elements* described in detail and documented? If yes, what is the name of the document? Where is it located?

Yes. PeopleSoft People Books and HRMS online help. Location T9E1B.

- b. Is the use of the data both relevant and necessary for the purpose for which the system is designed?

Yes.

- c. Will the system derive (i.e., create) new data or create previously unavailable data about an individual through aggregation from the information collected?

Yes.

- (1) How will aggregated data be maintained, filed, and utilized?

The aggregated data is maintained in the HRMS and a small subset of the data is also in the agency Financial and RPS systems and DOI's FPPS. Information is maintained

electronically by personnel specialist or payroll operations staff. Hard copy documentation are kept in the employee's personnel and time and attendance folders. Aggregate information is used to manage personnel information, employee wages and compensation, and labor cost data.

- (2) How will aggregated data be validated for relevance and accuracy?

To assure data integrity and internal controls, processes and data discrepancy reports are implemented in the NRC. Human Resources and Payroll Offices investigate any discrepancies that they discover or are brought to their attention by employees. Agency policies on information integrity, security, and roles and responsibilities are documented in a series of Management Directives relating to personnel and financial information.

4. If data are consolidated, what *controls* protect it from unauthorized access, use, or modification?

Data access is restricted in all agency systems to those who have a need to know. Internal agency policies and procedures define controls and protections based on OMB requirements and NIST guidelines. Controls are audited and tested routinely to assure adequate protections from unauthorized access, use or modification. The system utilizes user ID and password protections and rely on parameter defenses to protect the systems and records.

5. How will the data be *retrieved* from the system?

Data is usually retrieved by a system generated employee identification number or social security number.

- a. Can it be retrieved by personal identifier? Y Yes ___ No.
If yes, explain.

Employee Identification Number or Social Security Numbers.

- b. Is a password or data description required? Y Yes ___ No.
If yes, explain.

System user IDs and passwords are established by system security administrator following documented security procedures. Passwords automatically expire every 90 days to enforce periodic password changes.

6. Describe the report or reports that can be produced from this system.

- a. What reports are produced from the system?

Employee level personnel actions, organization/position, salary/awards and compensation, health and life insurance enrollment, dependent/beneficiary, leave/time and attendance, tax, retirement and budgetary and labor cost information, and license fee and cost reimbursements

- b. What are the reports used for?

The reports are used for human resources management, work force planning, payroll processing and reporting, labor reporting, and financial accounting purposes

- c. Who has access to these reports?

Staff from the Office of Human Resources, Office of the Chief Financial Officer, Office of Information Services, and office designated Time and Labor Coordinators based on relevance to the functions each office performs.

7. *Records retention*

- a. What are the record types contained in this system and the medium on which they reside? (Examples: type - program records, medium - electronic; type - database, medium - electronic; type - system documentation, medium - paper.)

<u>Type</u>	<u>Medium</u>
Programs	Electronic
Database	Electronic
System Documentation	Electronic and Paper
Security Documentation	Electronic and Paper
Federal Personnel Regulations	Electronic

- b. What is the NARA-authorized retention period for each records series in this system?

1. **General personnel records - The Official Personnel Folder is sent to the next Federal employing office if the employee transfers, or to the National Personnel Records Center within 30 days of the date of the employee's separation from the Federal service in accordance with GRS 1-1.b-OPF. Correspondence and forms maintained on the left side of the Official Personnel Folder are temporary records and are maintained for the periods of time specified in The Guide to Personnel Recordkeeping or other agency guidelines in accordance with GRS 1-10. Computer records are retained until no longer needed.**

2. Performance appraisal records - 4 years, Part A is then destroyed by incineration in accordance with GRS 1-23.a(4). If an employee separates, the records are forwarded to the next Government agency employer or to the National Personnel Records Center in accordance with GRS 1-23.a(3)(a). Part B is retained for 5 years, or until the fifth annual appraisal is completed, whichever is later, then destroyed by incineration in accordance with GRS 1-23.b(3). If the employee separates, the records are forwarded to the next Government agency employer or to the National Personnel Records Center in accordance with GRS 1-23.b(2)(a). Electronic records: Deleted after the expiration of the retention period authorized for the disposable hard copy file or when no longer needed, whichever is later in accordance with GRS 20-3.a.
3. Training records - 5 years, then destroyed by shredding in accordance with GRS 1-29.b.
4. Pay records - updated in accordance with GRS 2-1.a.
5. Annual and Quarterly Employee History Records on microfiche are transferred to the National Personnel Records Center and destroyed when 56 years old in accordance with GRS 2-1.b.
6. Non-current payroll data copies - 15 years after close of pay year in which generated in accordance with GRS 2-2.
7. Employee and Consultant Payroll Records: 1. U.S. savings bond authorizations are destroyed when superseded or after separation of employee in accordance with GRS 2-14.a. 2. Combined Federal Campaign allotment authorizations are destroyed after Government Accounting Office (GAO) audit or when 3 years old, whichever is sooner, in accordance with GRS 2-15.a. 3. Union dues and savings allotment authorizations are destroyed after GAO audit or when 3 years old, whichever is sooner, in accordance with GRS 2-15.b. 4. Payroll Change Files consisting of records used to change or correct an individual's pay transaction are destroyed after GAO audit or when 3 years old, whichever is sooner, in accordance with GRS 2- 23.a. 5. Tax Files consisting of State and Federal withholding tax exemption certificates, such as Internal Revenue Service (IRS) Form W-4 and the equivalent State form are destroyed 4 years after the form is superseded or obsolete or upon separation of employee in accordance with GRS 2-13.a. 6. Agency copy of employee wages and tax statements, such as IRS Form W-2 and State equivalents, are destroyed when 4 years old in accordance with GRS 2-13.b. 7. Leave record prepared upon transfer or separation of employee maintained in the Payroll office is destroyed when 3 years old in accordance with GRS 2-9.b.
8. Time and attendance source records maintained by Time and Attendance clerks and certifying officials are destroyed after

GAO audit or when 6 years old, whichever is sooner, in accordance with GRS 2-7.

9. Electronic time and attendance input records maintained in the HRMS are destroyed after GAO audit or when 6 years old, whichever is sooner, in accordance with GRS 2-8.
10. Payroll system reports providing fiscal information on agency payroll consisting of hardcopy and microfiche reports generated by the HRMS are destroyed when 3 years old, excluding the long-term Employee History Reports, in accordance with GRS 2-22.c.
11. Payroll system reports serving as error reports, ticklers, system operation reports are destroyed when related actions are completed or when no longer needed, not to exceed 2 years, in accordance with GRS 2-22.a.
12. Official notice of levy or garnishment (IRS Form 668A or equivalent), change slip, work papers, correspondence, release and other forms, and other records relating to charge against retirement funds or attachment of salary for payment of back income taxes or other debts of Federal employees are destroyed 3 years after garnishment is terminated in accordance with GRS 2-18.

- c. If unscheduled, what are your retention requirements for each records series in this system?

N/A

- d. What are the procedures for disposing of the data at the end of the retention period (specifically address paper copy, magnetic, or other forms of media)?

Paper	Destroyed in authorized receptacles (Classified and Sensitive Unclassified Waste containers)
Magnetic	Degrassing or burning
Electronic	These will be transferred or destroyed in accordance with NARA regulations.

- e. How long will produced reports be maintained?

Payroll System Reports are maintained as follows, depending on the type of report: Error reports, ticklers, system operation reports - Destroy when related actions are completed or when no longer needed, not to exceed 2 years. Reports and data used for agency workload and or personnel management purposes - Destroy when 2 years old. Reports providing fiscal information on agency payroll - Destroy after GAO audit or when 3 years old, whichever is sooner. See 7b.

- f. Where are the reports stored?

HR, OCFO, and each time and attendance unit located in the user offices throughout NRC in secured file cabinets.

- g. Where are the procedures for maintaining the data/reports documented?

General Records Schedule 2, Dec. 1988 (ADAMS Accession No. ML011440509).

- h. How will unused or unwanted reports be disposed of?

Paper	Destroyed in authorized receptacles (Classified and Sensitive Unclassified Waste containers)
Electronic	These will be transferred or destroyed in accordance with NARA regulations.

8. Capability to *monitor individuals*

- a. Will this system provide the capability to identify, locate, and monitor (e.g., track, surveillance) individuals? ☒ **Y** Yes ☐ No. If yes, explain.

The HRMS provides personal information such as name, address, job data, organization assignment, work schedules, and reported time and attendance information.

- b. What controls will be used to prevent unauthorized monitoring?

Access to the HRMS is restricted to those who have a need to know. The system cannot be accessed without a unique user identification and password. The level of access granted is determined by the position and need of each employee in relation to the position they occupy. All employees are given basic access to perform their own time and labor recording. Human Resources and the Office of the Chief Financial Officer have designated individuals who can request various levels of access for employees as needed. The Office of Information Services will set the level of access in the HRMS as requested by the designated contacts. Automated audit logs are reviewed to identify unauthorized access and monitoring.

9. Coverage Under Existing *Privacy Act System of Records*

- a. Under which Privacy Act System of Records (SOR) notice does this system operate (link to list of SOR available on NRC Internal Home Page)? Provide number and name.

**NRC-11, General Personnel Records
NRC-19, Official Personnel Training Records Files
NRC-21, Payroll Accounting Records
NRC-22, Personnel Performance Appraisals**

- b. If the Privacy Act System of Records is being modified, will the SOR notice require amendment or revision? ____ Yes X No
If yes, explain.

10. Access to the Data

- a. Who will have access to the data in the system (users, managers, system administrators, developers, other)?

Authorized NRC staff and contractors

- b. Are criteria, procedures, controls, and responsibilities regarding access documented? If so, where?

Yes. Electronically online on an NRC network server name Ownwas2. Documentation is also available (electronically) in Management Directives and in HRMS' online help.

- c. Will users have access to all data in the system or will users' access be restricted? Explain.

User access to data is restricted by the user ID. The system allows varying degrees of access data by user roles. See 8b.

- d. What controls are or will be in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access?

Access is monitored. Audit trails track user access by user ID with date and time stamps and reviewed periodically by assigned ISSO designees.

- e. Do other systems share data or have access to data in this system?
 X Yes ____ No. If yes, explain.

Yes, through system interfaces. Interface files are only provided to other systems which have a valid need for specific data.

- f. Will other agencies share data or have access to data in this system (Federal, State, local, other)? X Yes ____ No. If yes, explain.

Other Federal, State, and local agencies do not have direct access to the data, but receive reports or interface files as required by law. Reports and files contain only data needed to fulfill NRC reporting or administrative needs.

- g. Were Privacy Act clauses cited (or will be cited) and were other regulatory measures addressed in contracts with contractors having access to this system? X Yes ____ No. If yes, explain.

Contracts vehicles are required by the agency to included cited clauses for compliance with the Privacy Act of 1974.

DEFINITIONS

Personal Information is information about an identifiable individual that may include but not be limited to:

- race, national or ethnic origin, religion, age, marital or family status
- education, medical, psychiatric, psychological, criminal, financial, or employment history
- any identification number, symbol, or other particular assigned to an individual
- name, address, telephone number, fingerprints, blood type, or DNA

Aggregation of data is the taking of various data elements and then turning them into a composite of all the data to form another type of data such as tables or data arrays, or collecting data into a single database.

Consolidation means combining data from more than one source into one system, application, or process. Existing controls for the individual parts should remain or be strengthened to ensure no inappropriate access by unauthorized individuals. However, since individual pieces of data lose their identity, existing controls may actually be diminished; e.g., a summary census report may not point at the individual respondent but rather at a class of respondents, which makes it less personal.

PRIVACY IMPACT ASSESSMENT REVIEW/APPROVAL
(For Use by OIS Staff)

System Name: NRC Human Resources Management System (HRMS)

Submitting Office: Office of the Chief Financial Officer (OCFO)

A. PRIVACY ACT APPLICABILITY REVIEW

☐ Privacy Act is not applicable.

☒ Privacy Act is applicable. Currently covered under System of Records, NRC-11, General Personnel Records; NRC-19, Official Personnel Training Records Files; NRC-21, Payroll Accounting Records; NRC-22, Personnel Performance Appraisals. No modification to the system notice is required.

☐ Privacy Act is applicable. Creates a new system of records. FOIA/PA Team will take the lead to prepare the system notice.

☐ Privacy Act is applicable. Currently covered under System of Records NRC- . Modification to the system notice is required. FOIA/PA Team will take the lead to prepare the following changes:

Comments:

The HRMS is comprised of multiple modules which maintain employee Personnel; Training; and Payroll, Time and Labor data. However, the Training module maintains data on a small number of contractors required to take specific training courses. These contractors do not have access to HRMS, as employees do, to view their Training Summary. They must request a copy of this information. Contractors do perform certain data entry and system maintenance. Authorized access to one module does not automatically allow access to another module. Access for each module is based on a need to know to perform official duties.

Reviewer's Name	Title	Date
Sandra S. Northern	Privacy Program Officer	March 21, 2006

B. INFORMATION COLLECTION APPLICABILITY DETERMINATION

☒ No OMB clearance is needed.

☐ OMB clearance is needed.

☐ Currently has OMB Clearance.

Comments:

The Human Resources Management System does not collect information from non-Federal employees. Federal contractors (e.g., systems administrators or programmers supporting the system) submit identifying information and passwords to access the system. No OMB clearance is needed for this system.

Reviewer's Name	Title	Date
Christopher J. Colburn	Team Leader	March 21, 2006

C. RECORDS RETENTION AND DISPOSAL SCHEDULE DETERMINATION

☒ Additional information is needed to complete assessment.

☐ Needs to be scheduled.

☐ Existing records retention and disposition schedule covers the system - no modifications needed.

☐ Records retention and disposition schedule must be modified to reflect the following:

Comments: Information provided applying 22 separate GRS schedules to the material contained in HRMS seems to be incorrect for an electronic record keeping system. Descriptions provided describe disposition of paper records, not those captured in electronic form. Although, GRS 20-3 allows schedules for paper records to be applied to electronic versions of records covered by other GRS schedules, it is unclear what is in electronic form in HRMS and what is captured as paper records. For example;

7.b item 1, describes employee Official Personnel Folder (OPF) information. It is unclear whether the HRMS system has replaced the paper hard copy of this material. Has the file been scanned and captured in HRMS as an electronic OPF? Is it transferred to subsequent Federal employment offices in electronic form if the employee transfers agencies? How does the GRS paper schedule relate to this material?

7.b item 2 appears to be applying GRS 20-3 to the performance appraisal records. However, it is unclear whether the electronic copy in HRMS replaces the paper copy. A disposition that describes incineration of the record does not seem appropriate for an electronic record.

7.b item 3, states that employee training records are kept for 5 years, then destroyed by shredding. How would this disposition be performed on electronic records.

7.b. item 5, indicates that Annual and Quarterly Employee History records on microfiche are transferred to the National Personnel Records Center. Are these microfiche records somehow captured in HRMS? Is the microfiche computer generated from HRMS some how? If so, how long are the electronic versions kept in addition to the microfiche version?

Additionally, portions of HRMS are apparently maintained by the Department of Interior. The portions that are in DOI's system may need to be scheduled as DOI records. Application of NRC schedules to systems maintained by other Federal agencies may need special procedures to be developed to ensure that disposition is managed appropriately by both agencies.

Reviewer's Name	Title	Date
Jeff Bartlett	Senior Records Analyst	3/21/2006

 X Does not constitute a Privacy Impact Assessment required by the E-Government Act of 2002

 Does constitute a Privacy Impact Assessment required by the E-Government Act of 2002 and requires approval of the Director, IRSD.

John J. Linehan, Director, Information and Records Services Division

**TRANSMITTAL OF PRIVACY IMPACT ASSESSMENT/
PRIVACY IMPACT ASSESSMENT REVIEW RESULTS**

TO: (Sponsoring Office) Office of the Chief Financial Officer	Office Sponsor Timothy I. Pulliam, Director Division of Financial Services, OCFO	
Reginald W. Mitchell, Director Business Process Improvement and Applications Division, OIS	Name of System: Human Resources Management System (HRMS)	
Kathy L. Lyons-Burke, CISSP Senior IT Security Officer (SITSO)/Chief Information Security Officer (CISO) Office of Information Services	Date Received: 03/13/2006	Date Completed: 03/22/2006
<p>Noted Application Development and System Security Issues:</p> <p>Currently covered under System of Records, NRC-11, General Personnel Records; NRC-19, Official Personnel Training Records Files; NRC-21, Payroll Accounting Records; NRC-22, Personnel Performance Appraisals. No modification to the system notice is required.</p> <p>No OMB clearance is needed for this system.</p> <p>Further dialog is required to understand what materials are being maintained as paper records and which are being replaced by electronic files, and how records shared by NRC and DOI are to be managed. However, the need for additional information and further records evaluation does not preclude moving forward with the system certification.</p>		
Brenda J. Shelton, Chief Records and FOIA/Privacy Services Branch, OIS	Signature: R/A	Date: 03/22/2006