

## **U.S. Nuclear Regulatory Commission**

### **Revised Privacy Impact Assessment**

*(Designed to collect the information necessary to make relevant determinations regarding the applicability of the Privacy Act, the Paperwork Reduction Act information collections requirements, and record management requirements.)*

**for the**

### **Human Resources Management System (HRMS)**

**Date:** February 22, 2007

#### **A. GENERAL SYSTEM INFORMATION**

1. Provide brief description of the system:

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

2. What agency function does it support?

HRMS supports recording of employee activity based hours to be used primarily for payroll and fee billing.

3. Describe any modules or subsystems, where relevant, and their functions.

Human Resources - maintains employee demographic and salary information.

Historical HRMS Human Resources (prior to 11/2003 back to 01/1975) has the full range of personnel data from when the NRC was processing HR-related transactions directly in HRMS. HR processing is now done in the Department of Interior's (DOI) Federal Personnel/Payroll System (FPPS). Limited HR data is received from FPPS to HRMS to support Time and Labor processing e.g., new hire name, SSN, leave balances, standard hours of work. This information supports the enrollment and access to T&L so time can be collected and to send data from HRMS to DOI for payroll processing. The current HR information supports the Strategic Workforce system and Training Administration Modules. Historical HR data and limited current HR data will be available in the upgraded HRMS system. This is no change from what currently resides in HRMS.

Time and Labor - maintains employee activity based hourly reporting.

HRMS Time and Labor (from 11/2001 to date). All data will be available in the upgraded HRMS system. This is no change from what currently resides in HRMS.

Payroll - maintains historical payroll data and current leave balances.

Historical HRMS Payroll (11/2001 to 11/2003). Data will be converted to the Payroll Historical Database. The Payroll Historical Database contains payroll transactions from 01/1975 to 11/2001. Data will no longer be available through HRMS after the upgrade. Historical payroll data will continue to be accessible only by OCFO payroll staff for reporting purposes.

Training Administration - maintains employee training and development records.

HRMS Training (1/1975 to date). Data will be converted in its entirety as part of the e-Learning, e-Government initiative. HR is determining which OPM vendor will be selected and migrate to the new system PRIOR to the HRMS upgrade.

4. Points of Contact:

Project Manager	Office/Division/Branch	Telephone
<b>Jacqueline Jones</b>	<b>OCFO/DFS/TLPST</b>	<b>301-415-7384</b>
Business Project Manager	Office/Division/Branch	Telephone
<b>Lynnette Crawford</b>	<b>OCFO/DFS/TLPST</b>	<b>301-415-0255</b>
Technical Project Manager	Office/Division/Branch	Telephone
<b>Dereje B. Tessema</b>	<b>OIS/BPIAD/BPPMB.PMT2</b>	<b>301-415-5713</b>
Executive Sponsor	Office/Division/Branch	Telephone
<b>Gordon Peterson</b>	<b>OCFO/DFS</b>	<b>301-415-7348</b>

5. Does this Privacy Impact Assessment (PIA) support a proposed new system or a proposed modification to an existing system?

a. ☐ New System ☒ Modify Existing System ☐ Other (Explain)

b. If modifying an existing system, has a PIA been prepared before?

Yes

(1) If yes, provide the date approved and ADAMS accession number.

Date Approved - March 10, 2006  
Accession number - ML060740227

**B. INFORMATION COLLECTED AND MAINTAINED**

*(These questions are intended to define the scope of the information requested as well as the reasons for its collection. Section 1 should be completed only if information is being collected about individuals. Section 2 should be completed for information being collected that is not about individuals.)*

**1. INFORMATION ABOUT INDIVIDUALS**

- a. Does this system collect information about individuals?

Yes

- (1) If yes, what group(s) of individuals (e.g., Federal employees, Federal contractors, licensees, general public) is the information about?

Federal employees

- b. What information is being maintained in the system about individuals (describe in detail)?

The information maintained in the system is demographics, salary and benefits, leave balances, payroll data, activity based work hours and training administration.

- c. Is the information being collected from the subject individuals?

Yes

- (1) If yes, what information is being collected from the individuals?

Name, address, race, gender, benefits, social security number, bank account, time and attendance and training.

- d. Will the information be collected from 10 or more individuals who are **not** Federal employees?

No

- (1) If yes, does the information collection have OMB approval?

- (a) If yes, indicate the OMB approval number:

- e. Is the information being collected from internal files, databases, or systems?

Yes

- (1) If yes, identify the files/databases/systems and the information being collected.

Employee activity based profiles are collected from the Reactor Program System (RPS) database.

- f. Is the information being collected from an external sources(s)?

Yes

- (1) If yes, what is the source(s) and what type of information is being collected?

The source is an ASCII text file from the Department of Interior's (DOI) Federal Payroll and Personnel System (FPPS). The type of information is employee demographics, salary and benefits, leave balances and payroll.

- g. How will this information be verified as current, accurate, and complete?

Data is verified through Standard Form 52's and Earnings and Leave statements.

- h. How will the information be collected (e.g. form, data transfer)?

The information is collected via ASCII text files and database transfers.

- i. What legal authority authorizes the collection of this information?

NRC Management Directive 3.53  
National Archives and Record Management (NARA)  
General Services Administration (GSA)

- j. What is the purpose for collecting this information?

The purpose is to create paychecks for employees, FEES invoicing, Salary and Benefits modeling, Cost Accounting modeling, General Ledger activity and travel voucher payments.

## 2. **INFORMATION NOT ABOUT INDIVIDUALS**

- a. What type of information will be maintained in this system (describe in detail)?

Activity codes by which employee time is charged against

- b. What is the source of this information? Will it come from internal agency sources and/or external sources? Explain in detail.

The source of this information is the RPS system, an internal agency system. The information is transferred via database to database.

- c. What is the purpose for collecting this information?

Purpose is to pre-populate employee profiles to aide in the efficiency and accuracy of time entry.

**C. USES OF SYSTEM AND INFORMATION**

*(These questions will identify the use of the information and the accuracy of the data being used.)*

1. Describe all uses made of the information.

Uses of the data are as follows: data accuracy for transmissions to DOI, paycheck calculation, FEES billing, FFS, Salary and Benefits modeling, Cost Accounting modeling and Strategic Workforce Planning data elements.

2. Is the use of the information both relevant and necessary for the purpose for which the system is designed?

Yes

3. Who will ensure the proper use of the information?

All NRC employees

4. Are the data elements described in detail and documented?

Yes

- a. If yes, what is the name of the document that contains this information and where is it located?

PeopleBooks which delivered with the Oracle PeopleSoft product and is located on-line on the HRMS servers.

5. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?

Yes

- a. If yes, how will aggregated data be maintained, filed, and utilized?

The aggregated data will be maintained in the HRMS system. A small subset of this data is also in the agency Financial and RPS systems and

DOI's FPPS system. Information is maintained electronically by personnel specialists or payroll operations staff. Hard copy documentation is 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.

- b. How will aggregated data be validated for relevance and accuracy?

To assure data integrity and internal controls, data discrepancy reports have been created. 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.

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

Data access is restricted to the HRMS system based on your role and 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 utilized user ID and password protections and rely on parameter defenses to protect the systems and records.

6. How will the information be *retrieved* from the system (be specific)?

Data is retrieved by a system generated employee identification number.

7. Will this system provide the capability to identify, locate, and monitor (e.g., track, observe) individuals?

Yes

- a. If yes, explain.

Server and database audit logs are created when someone accesses HRMS. The logs state who the individual is and a date/timestamp of the action. Within the HRMS system changes are also tracked through audit logs. The audit logs differ based on the action being taken. The logs track who is making the change, when the change was made and what data elements were changed.

- (1) 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.

8. Describe the report(s) that will be produced from this system.

Employee level personnel actions, organization/position, salary/awards and compensation, leave/time and attendance, retirement and budgetary and labor cost information and license fee and cost reimbursements.

- a. What are the reports used for?

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

- b. 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.

**D. RECORDS RETENTION AND DISPOSAL**

*(These questions are intended to establish whether the information contained in this system has been scheduled, or if a determination has been made that a general record schedule can be applied to the information contained in this system. Reference NUREG-0910, "NRC Comprehensive Records Disposition Schedule.")*

1. Has a retention schedule for this system been approved by the National Archives and Records Administration (NARA)?

No

- a. If yes, list the disposition schedule.

2. Is there a General Records Schedule (GRS) that applies to information in this system?

Yes

- a. If yes, list the disposition schedule.

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		

3. If you answered no to questions 1 and 2, complete NRC Form 637, NRC Electronic Information System Records Scheduling Survey, and submit it with this PIA.

## **E. ACCESS TO DATA**

### **1. INTERNAL ACCESS**

- a. What organizations (offices) will have access to the information in the system?

All NRC Offices.

- (1) For what purpose?

For employee time entry and approvals and reporting of activities.

- (2) Will access be limited?

Yes

- b. Will other systems share or have access to information in the system?

Yes, Reactor Program System (RPS), Cost Accounting System (CAS), Federal Financial System (FFS), Department of Interior's/Federal Personnel/Payroll System (FPPS), Strategic Workforce Planning (SWP).

- c. How will information be transmitted or disclosed?

Information is transmitted over a dedicated line. All data files are either transmitted to other agencies or downloaded from their sites to NRC.

- d. What controls will prevent the misuse (e.g., unauthorized browsing) of information 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. Are criteria, procedures, controls, and responsibilities regarding access documented?



Yes.

(1) If yes, where?

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

## 2. **EXTERNAL ACCESS**

a. Will external agencies/organizations/public share or have access to the information in this system?

Yes

(1) If yes, who.

Department of Interior  
OPM

b. What information will be shared/disclosed and for what purpose?

Employee name, address, social security number, banking information, salary and time worked. Information is used for employee reporting, payroll and system maintainability.

c. How will this information be transmitted/disclosed?

The information is transmitted through file downloads over a dedicated line.

## F. **TECHNICAL ACCESS AND SECURITY**

1. Describe security controls used to limit access to the system (e.g., passwords). Explain.

Controls used to limit access to the system is a unique user id and password. Attempts to access the system are limited to three failed attempts before being locked out. Password expires after 90 days. Once in the system, access is limited by access classes as determined by the ISSO.

2. Will the system be accessed or operated at more than one location (site)?

Yes

a. If yes, how will consistent use be maintained at all sites?

All sites access the same database located at headquarters. For performance reasons, programs are executed from each of the regions. Access to these servers is restricted to certain personnel as determined by the ISSO.

3. Which user group(s) (e.g., system administrators, project manager, etc.) have access to the system?

There are several user groups that have access to the system. All employees for time entry are in an Employee group. Timekeepers are in a Timekeeper group. T&L Coordinators are in the Coordinator group. HR, T&L and Payroll are each in their own power groups. System administrators are in an all inclusive access group. Contractors have top level administrative rights to the system as developers of the system. Contractors support the operations and maintenance of the system, have full access to the data to add, delete, update information.

4. Will a record of their access to the system be captured?

Yes

- a. If yes, what will be collected?

User id and time and date stamp.

5. Will contractors have access to the system?

Yes

- a. If yes, for what purpose?

Contractors have access to the HRMS system to perform T&A duties (e.g a contractor secretary who handles T&A for a Branch). Select contractors have access for system maintenance, operations and development. No data about a contractor (T&A, training, personal, payroll) is collected and maintained in HRMS.

- Ensure that the following Federal Acquisition Regulation (FAR) clauses are referenced in all contracts/agreements/purchase order where a contractor has access to a Privacy Act system of records to ensure that the wording of the agency contracts/agreements/purchase order make the provisions of the Privacy Act binding on the contractor and his or her employees:
  - 52.224-1 Privacy Act Notification.
  - 52.224-2 Privacy Act.

6. What auditing measures and technical safeguards are in place to prevent misuse of data?

All access to the HRMS system is captured in system log files and audit records.

7. Are the data secured in accordance with FISMA requirements?

Yes

- a. If yes, when was Certification and Accreditation last completed?

August 2006 - IATO (expires August 2007)

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

**System Name:**      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. 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:**

This system contains PII. Authorized access to one module does not automatically allow access to another module. Access for each module is based on a need to know and/or to perform official duties.

Reviewer's Name	Title	Date
Sandra S. Northern	Privacy Program Officer	April 25, 2007

**B.      INFORMATION COLLECTION APPLICABILITY DETERMINATION**

☒ No OMB clearance is needed.

☐ OMB clearance is needed.

☐ Currently has OMB Clearance. Clearance No. \_\_\_\_\_

**Comments:**

The Human Resources Management System (HRMS) supports the collection and maintenance of general employee personnel records; employee time, attendance, and labor hour records; historical employee pay and compensation records, and employee training records. The information is collected only from Federal employees, and therefore, does not require an OMB Clearance Number.

Reviewer's Name	Title	Date
Christopher J. Colburn	Senior Automation Information Analyst	April 30, 2007

**C. RECORDS RETENTION AND DISPOSAL SCHEDULE DETERMINATION**

☐ No record schedule required.

☒ 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:**

Submission indicates that information contained in system is covered by multiple approved record schedules from NARA's General Record Schedule. Further review of the specific data collected under each designated GRS item is necessary to determine whether additional schedules need to be developed for the system. However, the need for further records management review of applicability of identified schedules does not preclude moving forward with the system certification.

Reviewer's Name	Title	Date
Jeff Bartlett	Senior Records Management Analyst	04/30/2007

**D. BRANCH CHIEF REVIEW AND CONCURRENCE**

  X   This IT system **does not** collect, maintain, or disseminate information in identifiable form from or about members of the public.

       This IT system **does** collect, maintain, or disseminate information in identifiable form from or about members of the public.

I concur in the Privacy Act, Information Collections, and Records Management reviews:

  /RA/    
Margaret A. Janney, Chief  
Records and FOIA/Privacy Services Branch  
Information and Records Services Division  
Office of Information Services

  05/01/2007    
Date

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

<b>TO:</b> <b>Timothy I. Pulliam, Director, Division of Financial Services, OCFO</b>	
<b>Name of System:</b> <b>Human Resources Management System (HRMS)</b>	
<b>Date RFPSB received PIA for review:</b> <b>April 16, 2007</b>	<b>Date RFPSB completed PIA review:</b> <b>May 1, 2007</b>
<b>Noted Issues:</b>  <p style="margin-left: 40px;">HRMS contains personally identifiable information (PII).</p> <p style="margin-left: 40px;">HRMS will operate under Privacy Act Systems of Records:</p> <div style="margin-left: 80px;"> <p>NRC-11, General Personnel Records;</p> <p>NRC-19, Official Personnel Training Records Files;</p> <p>NRC-21, Payroll Accounting Records; and</p> <p>NRC-22, Personnel Performance Appraisals.</p> </div> <p style="margin-left: 40px;">The information is collected only from Federal employees, and therefore, does not require an OMB Clearance Number.</p> <p style="margin-left: 40px;">Further review of the specific data collected under each designated GRS item is necessary to determine whether additional schedules need to developed for the system. However, the need for further records management review of applicability of identified schedules does not preclude moving forward with the system certification.</p>	
<b>Margaret A. Janney, Chief</b> <b>Records and FOIA/Privacy Services Branch</b> <b>Office of Information Services</b>	<b>Signature/Date: /RA/      05/01/2007</b>
<p><i>Copies of this PIA will be provided to:</i></p> <p><i>James C. Corbett, Director</i>  <i>Business Process Improvement and Applications Division</i>  <i>Office of Information Services</i></p> <p><i>Kathy L. Lyons-Burke, CISSP</i>  <i>Senior IT Security Officer (SITSO)/Chief Information Security Officer (CISO)</i>  <i>Office of Information Services</i></p>	