

## U.S. Nuclear Regulatory Commission

### 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 collection requirements, and records management requirements.*

### **Master Data Management (MDM) Enterprise Data Management System (EDMS)**

**Date:** November 28, 2017

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

##### **1. Provide a detailed description of the system:**

Master Data Management (MDM) is a discipline that incorporates both business and Information Technology (IT) needs to better manage NRC data by removing duplication, utilizing standards, and applying rules. MDM seeks to ensure uniformity, accuracy, stewardship, consistency, accountability, and accessibility of shared authoritative data. The Enterprise Data Management System (EDMS) is the NRC's primary tool for achieving the goals of MDM. EDMS is a web-based application—accessible to representatives from every NRC office—that provides standardized and validated dockets and data records that support dockets, including license, contact and billing information, to all downstream NRC systems that require that data. EDMS is built on a Master Data Services (MDS) for SQL Server 2012 (also known as Master Data Manager) platform, a Commercial Off-the-Shelf (COTS) product from the Microsoft Corporation that is used by NRC administrators to maintain the data model and data entities that comprise EDMS and support its operation.

##### **2. What agency function does it support?**

On October 1, 2017, EDMS became the authoritative source for all docket, docket contact and docket licensee information in NRC, and the source of creation for all new 050, 052, 700 and 999 dockets. In addition, EDMS passes Employee and Organization data received from EIH and FFPS, respectively, to subscriber systems, and is the source of creation for all Enterprise Project Identifiers, or EPIDs, which are the key elements in NRC's fee billing structure.

MDM/EDMS data is provided to the following subscriber systems:

- RRPS
- CRIS
- EATS, AMS, CMS
- ADAMS, EIE, PMNS
- FAIMIS

- CACS
- HOO DB

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

N/A

**4. What legal authority authorizes the purchase or development of this system?**

For the collection and maintenance of TIN data in EDMS: The Debt Collection Improvement Act 1996 (Public Law 104-134) "The head of each Federal agency shall require each person doing business with that agency to furnish to that agency such person's taxpayer identifying number".

The collection of billing data is required in order to recover fees in accordance with OBRA-90. 10 CFR 15 Debt Collection Procedures touches on billing data.

**5. What is the purpose of the system and the data to be collected?**

EDMS is used by representatives from every NRC office to access—and with specific permissions to generate—standardized and validated dockets and data records that support dockets, including license and billing information. EDMS has been modified to also store the Taxpayer Identification Number (TIN) of docket licensees as part of the billing information. In addition, EDMS provides this data to all downstream NRC systems that require such data for fee-billing, time-accounting, record-keeping and other activities, and is the source of creation for all Enterprise Project Identifiers (EPIDs), which also support those activities. Further, EDMS utilizes employee data received from the Enterprise Information Hub (EIH) to create point-of-contact records for dockets and EPIDs, and uses organization data supplied by the Federal Payroll/Personnel System (FPPS) to connect EPID requests to the EPID approvers for a specific NRC office. Employee and organization data is also passed to EDMS supplier systems to support their own specific activities.

**6. Points of Contact:**

<b>Project Manager</b>	<b>Office/Division/Branch</b>	<b>Telephone</b>
Elena Greynolds	OCIO/ITSDOD/NISB	301-287-0794
<b>Business Project Manager</b>	<b>Office/Division/Branch</b>	<b>Telephone</b>
Elena Greynolds	OCIO/ITSDOD/NISB	301-287-0794
<b>Technical Project Manager</b>	<b>Office/Division/Branch</b>	<b>Telephone</b>
Mackenzie Stevens	OCIO/ITSDOD/BADB/BPAT	301-287-0838
<b>Executive Sponsor</b>	<b>Office/Division/Branch</b>	<b>Telephone</b>
Thomas Rich	OCIO/ITSDOD	301-287-0763

**7. 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?**

No

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

N/A

(2) **If yes, provide a summary of modifications to the existing system.**

N/A

**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 maintain information about individuals?**

YES

(1) **If yes, identify the group(s) of individuals (e.g., Federal employees, Federal contractors, licensees, general public).**

Individuals may be Federal employees, Federal contractors or commercial vendors who are NRC licensees.

(2) **IF NO, SKIP TO QUESTION B.2.**

b. **What information is being maintained in the system about an individual (be specific)?**

**Employees:**

The Employee entity in EDMS contains data for both current and past individual NRC employees and contractors supplied through an interface with EIH. The Employee entity has the following fields: LAN ID, Email ID, First Name, Middle Name, Last Name, Name Suffix, Status (Active or

Inactive), Affiliation (Employee or Contractor), Position, Employee ID, Effective Date, Termination Date and Organization. This data is not modifiable in EDMS; any changes made to the data are applied at the source and pushed to EDMS daily. An amalgam of the employee First Name and Last Name is used as the Name for each record in the Employee entity. These Name values are utilized in EDMS to establish points-of-contact for Dockets and EPIDs. EPID contacts are the Name value only. Docket contacts are individual records (hereafter "Contact records") created in EDMS and linked to one or more dockets. Contact records connect the Name value with email, phone and physical address information for that individual. This data is entered and maintained by EDMS users with specific permissions. Contact records are not currently utilized outside of EDMS and are not passed to subscriber systems. Employee data in EDMS is not linked to TINs or other licensee data.

**Licensees:**

Required fields are Name (of license holder entity, which could be an individual), Legal Contact Name (person representing license holder entity), and the Street Address, City, could be a State (if U.S.), Country and Zip of that legal contact. Optional information: legal contact phone and email address. The license holder entity will now be required to also provide the TIN associated with the entity. In the case of some small businesses this TIN may actually be the Social Security Account Number (SSAN) of the business owner who is likely named as the legal contact.

**c. Is information being collected from the subject individual?**

NO, EDMS does not collect the information directly from the individuals. Employee data is being passed to MDM/EDMS from the Enterprise Identity Hub (EIH). Licensee information is being passed to MDM/EDMS from WBL or is being added/maintained by NRC employees with specific user roles in MDM/EDMS that are restricted to data germane to their NRC office. A business applying for a license submits an application to NRC that includes the information. In EDMS, TINs may only be viewed, added and modified by users in the service account group or who are assigned an OCFO Contributor role. TINs related to Specific License (NMSS) Docket Licensees and Reciprocity Licenses may be viewed by these users, but not added or modified

**(1) If yes, what information is being collected?**

N/A

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

YES

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

YES

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

- OMB clearance No. 3150-0188 provides authority to the NRC, specifically the Office of the Chief Financial Officer (OCFO) for NRC Form 531 “Request for Taxpayer Identification Number”.

**e. Is the information being collected from existing NRC files, databases, or systems?**

YES and NO

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

EDMS receives employee data on a nightly basis from EIH. It does not contain TINs or licensee data, and it is not linked to that data. See detailed description in section B.1.b.

EDMS receives licensee data regarding NMSS dockets—including TINs—on a nightly basis from WBL. For all other dockets that existed prior to EDMS becoming the authoritative source for such information, docket licensee data was imported from L-RPS. New docket licensee data is now entered directly into EDMS. OCFO already maintained some TINs in FAIMIS, collected using NRC Form 531. As a first step regarding the inclusion of TINs in EDMS, FAIMIS (in a one-time transfer) provided to EDMS those TINs that were already on-hand. Going forward new applicants or licensees applying for an amendment who have not yet provided their TIN to the NRC will provide the TIN using NRC Form 531 and OCFO staff with the specific EDMS user role of OCFO Contributor will input the TIN in EDMS. EDMS will then transfer the TIN and other licensee data to FAMIS on a nightly basis along with the data being passed from WBL.

**f. Is the information being collected from external sources (any source outside of the NRC)?**

YES – Current license holders and applicants.

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

Licensee applicants must submit an application (via NRC Form 313), which includes the business information of the licensee as well as contact information for the licensee representative. Applicants are also required to submit the TIN and billing information using NRC Form 531.

- g. **How will information not collected directly from the subject individual be verified as current, accurate, and complete?**

This information is verified during the business process of reviewing licensee applications, which is conducted by the Office of Nuclear Material Safety and Safeguards (NMSS) and Regions I, III & IV for all materials dockets coming from WBL, by The Office of Nuclear Reactor Regulation (NRR) for 050 docket information, and by The Office of New Reactors (NRO) for 052 and 999 docket information. The Office of the Chief Financial Officer (OCFO) is responsible for the accuracy of the TIN and other billing information for all dockets.

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

Licensees and applicants can send the information via the license application paper form (NRC Form 313) and the TIN paper form (NRC Form 531).

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

- a. **Will information not about individuals be maintained in this system?**

YES

- (1) **If yes, identify the type of information (be specific).**

**Licensee information:** License holder entity name (if not an individual), type of docket licensee (applicant, certificate holder or licensee), legal contact address and phone number (if not associated with an individual), TIN and billing address (if not associated with an individual), From & To dates of the license holder entity's relationship with the docket;

**License Information:** License number, operational phase covered by the license, From and To dates that the license is in effect;

**Docket information:** Docket Name, Docket Number, 10 CFR Part Number, Docket Type, Docket Category, Owner Office, Operational Phase (of docket), Region, Active or Historical status (of docket);

**EPID information:** Name (of Enterprise Project), Enterprise Project Activity Type, Year (of start date), Project ID (EPID), Start Date, End Date, Status (of Enterprise Project- Active/Inactive), Request ID (if request was created external to EDMS), Contact, Requester, Requesting Office, Approval Status (of EPID Request – Pending, Approved, Rejected, Needs Edits), Approver, ML Number. EPIDs are not associated with TINs or Licensee data.

**Organization Data:** Levels 1-5 Abbreviation & Description fields,

Active, Effective Date, Organization Name, Organization Abbreviation. Organization data is used to direct EPID requests to appropriate approvers. It is not associated with TINs or Licensee data.

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

The licensee information comes from the license application (NRC Form 313), the TIN paper form (NRC Form 531), and from NRC (reviewers in each Region and HQ).

EPID information is entered into EDMS by users representing specific NRC offices with the EPID Creator role or via an API connection to EDMS from RRPS.

Organization data is transmitted to EDMS from FPPS

**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 data in this system.**

The purpose of EDMS is to standardize and validate docket and license information so that all recipient systems downstream of EDMS get uniform, accurate and complete data for fee billing, time accounting, record keeping, reporting, etc. The information related to fee billing is used by OCFO for issuing invoices, refunds, and collections. The TIN and all other fee billing related information is routinely passed to FAIMIS for fee billing purposes.

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

YES

- 3. Who will ensure the proper use of the data in this system?**

Staff in the offices of NRR, NRO, NMSS, OCFO and the Office of the Chief Information Officer (OCIO).

- 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?**

The EDMS.v.1.5.0.MetadataExport document, once completed, will be uploaded to ADAMS.

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

NO

*Derived data is obtained from a source for one purpose and then the original information is used to deduce/infer a separate and distinct bit of information that is aggregated to form information that is usually different from the source information.*

*Aggregation of data is the taking of various data elements and then turning it into a composite of all the data to form another type of data (i.e. tables or data arrays).*

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

N/A

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

N/A

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

N/A

6. **How will data be *retrieved* from the system? Will data be retrieved by an individual's name or personal identifier? (Be specific.)**

**Within the Application**

An EDMS user can access docket and related licensee information in the EDMS application via search queries of the Docket, Specific License Docket, Vendor Docket and Reciprocity License entities or by paging through the summary/listing screens for each of these entities. 050, 052 and 700 dockets that are missing required data, NRC contacts and/or that have been modified within the previous 7 days may be accessed via dashboard lists on the EDMS Home page, the display of which is governed by specific user role permissions. However, licensee information related to Dockets (050, 052, 700) and Specific License Dockets (030, 040, 070, 071, 072, 110 and WM0) is only accessible via the associated docket record and therefore cannot be directly queried via the EDMS search feature. That is, users must first locate and access the docket record to access the associated licensee data. Licensee data for the Vendor Docket (999) and Reciprocity License (150) entities is structurally integrated into those docket records rather than being attached to them, so direct queries of that licensee data may be performed in those entities. In those cases, queries may be keyed on a single or any multiple combination of data fields, including Legal Contact Name, phone number, email and physical mailing address. Search results and any entity summary/listing page in EDMS may be exported into an Excel file. TIN data for Docket and Vendor Docket licensees may be accessed, viewed and



modified only by EDMS users with the OCFO Contributor user role. Users with that role may also access and view, but not modify, TIN data for Specific License Docket and Reciprocity License licensees.

EPID data may be accessed via search queries of the Enterprise Project entity or by paging through the summary/listing screen for that entity.

The Employee and Organization entities may not be viewed or modified by any EDMS user. Employee name values as they exist in Contact entity records may be searched via queries on the Name and Employee fields. As they exist in the Enterprise Project entity, Employee name values may be search by queries on the Contact, Requester and Approver fields. Organization values, as they exist in the Enterprise Project entity, may be searched via queries using selected values in the Requesting Office drop-down field.

#### **Via Interface with EDMS/MDM**

NRC systems that receive docket, licensee, employee and organization data from EDMS/MDM do so either via an Application Programming Interface (API) Webservice connection or through scheduled data retrievals from the MDM database. The API Webservice connection permits access to a Consolidated Docket View (CDV) that contains all data for all dockets in EDMS/MDM including associated licensee information, and allows direct queries to be made on a single column or any combination of multiple columns from the UI of the interfacing system. This includes Legal Contact Name, phone number, email and physical mailing address. TIN data is not included in the CDV, and the CDV cannot be modified via the interface. Similarly, the API webservice connection permits access to a Consolidated Employee Organization View (CEOV) that contains all employee and organization data the EDMS receives from EIH and FPPs, respectively. As with the CDV, TIN data is not included and the CEOV cannot be modified via the interface.

EPID requests may be created and approved via an API connection with RRPS.

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

NO

**a. If yes, explain.**

N/A

**(1) What controls will be used to prevent unauthorized monitoring?**

N/A

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

There are no reports produced directly from/by EDMS/MDM. Any reports utilizing data received from EDMS/MDM are produced from interfacing systems and are solely controlled by those systems.

a. **What are the reports used for?**

N/A

b. **Who has access to these reports?**

N/A

D. **ACCESS TO DATA**

1. **Which NRC office(s) will have access to the data in the system?**

At a minimum, all NRC employees are to have the role of **MDM User**, which allows read-only access to all data in EDMS, including docket and docket licensee information. Users requiring create/modify ability are granted user roles that correspond to their NRC office or to a specific EDMS task that they have been assigned to perform for their office. Those roles that do are listed below.

(1) **For what purpose?**

**Contact Contributors** can represent any NRC office, but are most likely aligned with NRR or NRO. They have create/modify ability for all Contact records and can create/modify Contact associations with Dockets and Vendor Dockets.

**EPID Creators** can represent any NRC office. They are typically users whose sole activity in EDMS is to create EPID requests for their NRC office. EPID Creator can also be an add-on permission for users with other roles, such as NRR Contributor, Vendor Contributor, etc., who are also responsible for EPID request creation.

- **EPID Approvers** can represent any NRC office. They are users whose sole activity in EDMS is to review EPID requests created for their NRC office, and either approve, reject or return them to the EPID Creator for modification. They can also modify specific fields in EPID records for their office, post-approval.
- **NRR Contributors** and **NRO Contributors** represent those specific offices. They have create/modify ability for Dockets, Docket Licensees and all entities that populate the drop-down fields for Dockets. Modify ability for specific docket records is limited to users whose role assignment matches the docket's designated Owner Office; data is read-only for dockets owned by other offices. These users can also create/modify Contact records and link them with dockets.
- **OGC Contributors** are representatives of NRC's Office of General Counsel. These users have create/modify ability for Dockets and

Docket Licensees, which they use to create and maintain Touhy Request (700) dockets. OGC Contributors can add and modify Contact links to dockets, but cannot create/modify Contact records. They have read-only access to dockets assigned to Owner Offices other than OGC.

- **MDM Administrators** can represent any NRC office, but are most likely aligned with NRR or NRO. These have the same create/modify abilities as NRR and NRO Contributors, but can modify dockets owned by any NRC office. The primary function of MDM Administrators is to create/modify business rules attached to fields in EDMS using Master Data Services (MDS) for SQL Server 2012 (also known as Master Data Manager), a Commercial Off-the-Shelf (COTS) product from the Microsoft Corporation that is used by to maintain the data model and data entities that comprise EDMS and support its operation.
- **Vendor Contributors** are representatives from NRO whose work in EDMS is to create/modify Vendor Dockets (999), including the licensee data that's included in the Vendor Docket structure, and the Vendor Company records that are central to the creation of the dockets. Vendor Contributors can add and modify Contact links to Vendor Dockets, but cannot create/modify Contact records.
- **OCFO Contributors** are representatives from OCFO who can view, add and modify TIN data and billing information for Docket and Vendor Docket licensees. They can view TIN and billing data of Specific License Docket and Reciprocity License licensees, but cannot add or modify it. OCFO Contributors are the only EDMS users with access to TIN data.
- **Power Users** are representatives from OCIO who have oversight of EDMS and the MDM program. Power Users have create/modify ability for all docket and docket licensee data entities, including those for which the data is maintained in WBL. This role is meant primarily for system troubleshooting and not data maintenance. Despite their abilities, Power Users cannot access TIN data.

(2) **Will access be limited?**

YES, see details above.

2. **Will other NRC systems share data with or have access to the data in the system?**

YES

(1) **If yes, identify the system(s).**

EDMS/MDM docket and docket licensee information, employee and organization data, and EPIDs are shared with the following NRC systems:

- **Financial Accounting & Integrated Management Information System (FAIMIS)** - FAIMIS is the only system that will have access to the TIN via EDMS.
- **Replacement Reactor Program System (RRPS)**
- **Centralized Reporting Information System (CRIS)**
- **Enforcement Action Tracking System (EATS), Allegation Management System (AMS) and Case Management System (CMS)**
- **Agencywide Documents Access and Management System (ADAMS), Electronic Information Exchange (EIE) and Public Meeting Notice System (PMNS)**
- **Cost Activity Code System (CACS)**
- **OCIMS HOO DB**

**(2) How will the data be transmitted or disclosed?**

Either via an Application Programming Interface (API) Webservice connection or through scheduled data retrievals from the MDM database. The API Webservice connection permits access to the Consolidated Docket View (CDV) that contains all data for all dockets in EDMS/MDM including associated licensee information, and the Consolidated Employee-Organization View (CEOV) that contains all data received from EIH and FPPS. Both views allow direct queries to be made on a single column or any combination of multiple columns from the UI of the interfacing system. This includes Legal Contact Name, phone number, email and physical mailing address in the CDV. TIN data is not included in either the CDV or CEOV, and neither view may be modified via the interface. Enterprise Project Identifiers (EPIDs) are also transmitted via API Webservice connection.

**3. Will external agencies/organizations/public have access to the data in the system?**

NO

**(1) If yes, who?**

N/A

**(2) Will access be limited?**

N/A

**(3) What data will be accessible and for what purpose/use?**

N/A

**(4) How will the data be transmitted or disclosed?**

N/A

**E. RECORDS RETENTION AND DISPOSAL**

*The National Archives and Records Administration (NARA), in collaboration with federal agencies, approves whether records are temporary (eligible at some point for destruction/deletion because they no longer have business value) or permanent (eligible at some point to be transferred to the National Archives because of historical or evidential significance). These determinations are made through records retention schedules and are required under 36 CFR 1234.10. The following questions are intended to determine whether the records in the system have an approved records retention schedule or if one will be needed.*

- 1. Can you map this system to an applicable retention schedule in [NUREG-0910](#), or the [General Records Schedules](#) at <http://www.archives.gov/records-mgmt/grs> ?**

NO

- a. If yes, please cite the schedule number, approved disposition, and describe how this is accomplished. For example, will the records or a composite thereof be deleted once they reach their approved retention or exported to a file for transfer based on their approved disposition?**
- b. If the answer to question E.1 is yes, skip to F.1. If the response is no, complete question E.2 through question E.7.**

- 2. If the records cannot be mapped to an approved records retention schedule, how long do you need the records? Please explain.**

EDMS does not delete, remove, or replace existing information

- 3. Would these records be of value to another organization or entity at some point in time? Please explain.**

NO

- 4. How are actions taken on the records? For example, is new data added or updated by replacing older data on a daily, weekly, or monthly basis?**

New employee and organization data in EDMS is refreshed daily with data from EIH and FPPS, respectively. NMSS docket data is also refreshed daily, with data from WBL. New 050, 052, 700 and 999 dockets are added, and existing records modified, by user interactions with the system. The docket records cannot be deleted, removed or replaced.

- 5. What is the event or action that will serve as the trigger for updating, deleting, removing, or replacing information in the system? For example,**

**does the information reside in the system for three years after it is created and then is it deleted?**

Any updates, or receipt of new information triggers updating. The system does not delete, remove, or replace existing information. It maintains a historical chronology.

- 6. Is any part of the record an output, such as a report, or other data placed in ADAMS or stored in any other location, such as a shared drive or MS SharePoint?**

YES, Docket Number data is pulled to ADAMS on an hourly basis via a DB connection to ensure that any new dockets created in EDMS are captured.

- 7. Does this system allow for the deletion or removal of records no longer needed and how will that be accomplished?**

NO

**F. TECHNICAL ACCESS AND SECURITY**

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

Roles are managed through Active Directory Groups.

- 2. What controls will prevent the misuse (e.g., unauthorized browsing) of system data by those having access?**

Roles limit view and modify access to individuals identified by NRC offices to have these permissions.

- 3. Are the criteria, procedures, controls, and responsibilities regarding access to the system documented?**

YES, EDMS roles and access are documented.

**(1) If yes, where?**

EDMS-Role-Permission Matrix.xlsx, which will be posted to ADAMS

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

YES, access is through a web browser.

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

N/A

5. **Which user groups (e.g., system administrators, project managers, etc.) have access to the system?**

See Section D.1.1.

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

YES, in system logs

- a. If yes, what will be collected?

LAN ID and date/time stamp

7. **Will contractors be involved with the design, development, or maintenance of the system?**

YES

*If yes, and if this system will maintain information about individuals, ensure Privacy Act and/or PII contract clauses are inserted in their contracts.*

- *FAR clause 52.224-1 and FAR clause 52.224-2 should be referenced in all contracts, when the design, development, or operation of a system of records on individuals is required to accomplish an agency function.*
- *PII clause, "Contractor Responsibility for Protecting Personally Identifiable Information" (June 2009), in all contracts, purchase orders, and orders against other agency contracts and interagency agreements that involve contractor access to NRC owned or controlled PII.*

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

Auditing - Microsoft Master Data Services logs every change to every field completed by an end user.

Safeguards – Access is controlled via Active Directory groups

9. **Are the data secured in accordance with FISMA requirements?**

YES

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

September 2016

**PRIVACY IMPACT ASSESSMENT REVIEW/APPROVAL**  
(For Use by OCIO/ISB Staff)

**System Name:** Master Data Management (MDM) - Enterprise Data Management System (EDMS)

**Submitting Office:** Office of the Chief Information Officer (OCIO)

**A. PRIVACY ACT APPLICABILITY REVIEW**

☐ Privacy Act is not applicable.

☒ Privacy Act is applicable.

**Comments:**

This system will contain personally identifiable information (PII) and is covered by Privacy Act System of Records: NRC 32 Office of the Chief Financial Officer Financial Transactions and Debt Collection Management Records.

Reviewer's Name	Title	Date
Sally A. Hardy	Privacy Officer	12/19/17

**B. INFORMATION COLLECTION APPLICABILITY DETERMINATION**

☒ No OMB clearance is needed.

☐ OMB clearance is needed.

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

**Comments:**

Reviewer's Name	Title	Date
David Cullison	Agency Clearance Officer	12/15/17



**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.

**Comments:**

This system will need to be scheduled; therefore, NRC records personnel will need to work with staff to develop a records retention and disposition schedule for records created or maintained. Until the approval of such schedule, these records and information are **permanent**. Their willful disposal or concealment (and related offenses) is punishable by fine or imprisonment, according to 18 U.S.C., Chapter 101, Section 2071. Implementation of retention schedules is mandatory under 44 U.S. 3303a(d), and although this does not prevent further development of the project, retention functionality or a manual process must be incorporated to meet this requirement.

Reviewer's Name	Title	Date
Marna B. Dove	Sr. Program Analyst, Electronic Records Manager	12/19/2017

**D. BRANCH CHIEF REVIEW AND CONCURRENCE**

- ☐ 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/\_\_\_\_\_  
Anna T. McGowan, Chief  
Information Services Branch  
Governance & Enterprise Management  
Services Division  
Office of the Chief Information Officer

Date December 21, 2017

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

<b>TO: Thomas Rich, Director, IT Services Development &amp; Operations Division, Office of the Chief Information Officer</b>	
<b>Name of System: Master Data Management (MDM) - Enterprise Data Management System (EDMS)</b>	
<b>Date ISB received PIA for review: November 28, 2017</b>	<b>Date ISB completed PIA review: December 19, 2017</b>
<b>Noted Issues:</b>  MDM/EDMS is being modified to store the Taxpayer Identification Number (TIN) of the license applicant as one of a set of actions intended to enhance the accuracy of license fee billing. Since collecting TINs (which could occasionally be Social Security Number (SSN)) and SSNs are considered PII information this system would be considered a Privacy Act System of Records. This system would be covered by NRC 32 Office of the Chief Financial Officer Financial Transactions and Debt Collection Management Records.	
<b>Anna T. McGowan, Chief Information Services Branch Governance &amp; Enterprise Management Services Division Office of the Chief Information Officer</b>	<b>Signature/Date:  /RA/ December 21, 2017</b>
<i>Copies of this PIA will be provided to:</i>  <i>Tom Rich, Director IT Services Development &amp; Operation Division Office of the Chief Information Officer</i>  <i>Jonathan Feibus Chief Information Security Officer (CISO) Governance &amp; Enterprise Management Service Division Office of the Chief Information Officer</i>	