

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

### **Privacy Impact Assessment v1.0**

*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.*

### **Federal Personnel Payroll System (FPPS) Workforce Tracking and Transformation System (WTTS) Entrance on Duty System (EODS)**

**Date:** February 8, 2018

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

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

The Department of the Interior's (DOI) Interior Business Center (IBC) manages the FPPS, WTTS, and EODS web applications which provide payroll and human resources support for the NRC. FPPS processes NRC personnel, payroll, and time and labor data to facilitate payments, benefits, and pensions, in addition to providing HR and payroll data to a Datamart server which is used to prepare reports.

WTTS/EODS is used to initiate, authorize, and track recruitment, hiring, and on-boarding activities, including vacancy, selectee, and new hire forms data. WTTS/EODS provides real-time data exchange via encrypted web connections with e-Gov applications such as FPPS, NRCareers, and the electronic Official Personnel File (e-OPF).

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

FPPS supports the agency's payroll and benefits processes by accepting time and labor entries from the NRC and returning payroll information. NRC OCHCO personnel can enter payroll actions into FPPS, and NRC employees can enter some data into Employee Express which is transferred to FPPS automatically.

WTTS/EODS support the streamlining of federal hiring processes and reduce the duplication of data; information about new hires or selectees is gathered once and disseminated to other authorized systems that use the data.

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

The FPPS Datamart server creates reports from all personnel, payroll, and time & labor data. Ad-hoc reports can also be created by authorized users.

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

Pub. L. 104-193, Personal Responsibility and Work Opportunity Reconciliation Act of 1996; 5 U.S.C. 6334; 31 U.S.C. 716, 1104, 1105, 1108, 3325, 3511, 3512, 3701, 3711, 3713, 3718; Executive Order 9397; and 42 U.S.C. 2000e-16.

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

FPPS's purpose is to provide accurate pay and benefits to NRC employees.

WTTS/EODS both support the hiring process and reduction of information duplication that is collected during the hiring process.

**6. Points of Contact:**

<b>Project Manager</b>	<b>Office/Division/Branch</b>	<b>Telephone</b>
Briana Dade (WTTS)	OCHCO/ADHROP/OBB	301-287-0717
Bonita Cook (FPPS)	OCHCO/ADHROP/OBB	307-287-0704
<b>Business Project Manager</b>	<b>Office/Division/Branch</b>	<b>Telephone</b>
Jason Shay	OCHCO/ADHROP	301-287-0590
<b>Technical Project Manager</b>	<b>Office/Division/Branch</b>	<b>Telephone</b>
Brendan Cain	OCHCO/HCAB	301-287-0552
<b>Executive Sponsor</b>	<b>Office/Division/Branch</b>	<b>Telephone</b>
Miriam Cohen	OCHCO	301-287-0747

**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?

Yes

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

FPPS: ML062430057, August 24, 2006

WTTS/EODS: ML11220A009, August 2, 2011

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

The authorization for FPPS and WTTS/EODS is being combined into a single effort.

**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).**

NRC and other Federal employees including new hires and individuals selected for NRC positions.

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

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

FPPS stores personnel records, payroll records, time & labor data, and earnings & leave statements including SSN, name, address, grade, salary, hourly rate, leave balances, deductions, tax information, awards data, performance ratings, benefits information, hours recorded each pay period, and retirement plan.

WTTS/EODS stores new hire employment forms including personnel, benefits, and payroll forms, direct deposit bank information, benefits elections, beneficiary forms, Federal income tax withholding information, and Federal/military service records.

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

Yes

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

SSN, name, address, banking information, age, sex, race, tax exemptions, handicap status, health and life insurance enrollments.

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

Yes (EODS)

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

yes

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

OMB Control Number 3206-0219 and various OMB approved employment forms (personnel, benefits, and payroll).

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

Yes (WTTS/EODS)

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

Information in WTTS/EODS is populated from NRCareers through secure, encrypted web interconnections operated by DOI/IBC.

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

Yes (FPPS)

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

NRC time & labor data is sent to FPPS through a biweekly interface file and employee submissions are collected from the Employee Express system.

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

Time & labor information is verified by an employee's approving official. HRMS verifies data is accurate and information is also reviewed by FPPS, DOI, and NRC payroll staff. Weekly QA reports are run to ensure the completeness and accuracy of information.

Human resources personnel verify and approve data entered by WTTS hiring officials. Selectees can review and update their personal information in EODS, using electronic signatures to certify accuracy. FPPS and WTTS provide online edits throughout the data input process to ensure required data is complete.

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

Personnel and payroll forms are entered into FPPS by DOI and NRC staff. NRC employees enter transactions in Employee Express for actions such as tax exemptions and enrollment into TSP, direct deposit, and health benefits. A file transfer occurs between Employee Express and FPPS.

Selectees utilizing EODS input data into forms which are transferred electronically via secure web connections to WTTS and FPPS.

**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).**

FPPS stores an organization names and personnel action subtypes to facilitate in-depth reporting.

WTTS stores information about vacancies including position title, pay plan, series, grade, performance level, pay basis, organization, supervisory status, vacancy number, Fair Labor Standards Act category, and drug test code.

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

Organizational information comes from internal OCHCO sources, vacancy information comes from internal hiring and OCHCO officials.

**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 information is used to pay employees, to manage their employment benefits, and to satisfy statutory collection and reporting requirements. Reports can be produced from FPPS and from the DOI FPPS Datamart that contains personnel

and payroll data. Reports are used by Human Resources and the Chief Financial Officer's staff to perform their duties.

WTTS/EODS data is used for management and OPM reports on workforce planning, recruitment activities, full-time equivalent (FTE) projections, and hiring statistics; new hire on-boarding; and personnel transaction processing.

**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?**

The Chief of the Payroll and Payments Branch of the Division of the Controller and the NRC Chief Human Capital Officer.

**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?**

FPPS Data Dictionary:

[https://fppsinfo.ibc.doi.gov/datadict/webhelp/data\\_dict.cfm](https://fppsinfo.ibc.doi.gov/datadict/webhelp/data_dict.cfm) The WTTS/EODS User's Guide which is maintained and updated by the system owner, DOI/IBC.

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

Yes (FPPS)

*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?**

Data is processed biweekly when the payroll process runs. This results in earnings & leave statements and completed personnel actions for the pay

period. The data is maintained in FPPS and is backed up to protect against data loss. The data is used to maintain a personnel history of each employee and provide them with biweekly salary payments.

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

Data is validated through system edits and reviewed by OCHCO and Payroll staff. Employees review their earnings & leave data in Employee Express which records and informs the payroll help desk of any discrepancies. Annual audits of data and records are also performed.

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

Data can only be accessed by authorized users that have a valid user ID and password and can only be modified by those staff with that responsibility and access.

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

The FPPS information can be retrieved using a query menu or various data entry screens. Reports that retrieve the data are based on an employee's SSN and a time frame or specific pay period. Some standard reports exist that cover most of the inquiries. Additional reports can be created as needed.

Information can be retrieved on WTTS/EODS reports by: WTTS record ID, FPPS transaction number, report type, WTTS status, selectee last name, organization code, entrance on duty date, position title, series, supervisor/hiring official ID, employee type (permanent/non-permanent), vacancy announcement number, record modified date, or fiscal year.

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

No

**a. If yes, explain.**

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

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

FPPS Datamart contains complete personnel and payroll data that can be used to create a report using any of the available data fields.

On-line WTTS/EODS reports include: 80-day Hiring Activity Report, Drug Testing, Facilities and IT Security, HR Reports, In-processing, and New Hire Report.

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

FPPS reports are used for personnel, payroll and time & attendance processing. They are also used to research or confirm a payroll or human resources issue regarding a specific employee.

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

FPPS reports are accessible by employees in the OCHCO and Payroll offices and the DOI systems staff.

Authorized users of WTTS/EODS will have access to these reports including HR representatives at NRC HQ and Regional offices, NRC management officials, and corporate support representatives. Level of access to reports and/or report content will be based on roles, responsibility, and need-to-know.

**D. ACCESS TO DATA**

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

All NRC offices and regions have access to the systems.

**(1) For what purpose?**

Time & labor data is validated by all supervisors and admins for their direct reports. Personnel and payroll functions are performed by NRC OCHCO staff from HQ and each region. SBCR uses the system to run reports. OCHCO personnel use WTTS to manage the hiring process.

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

Access is limited to OCHCO and payroll staff positions that have duties related to this function. Access is based on user roles, which are assigned during account creation.

**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).**

HRMS, NRCareers, and e-OPF



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

The DOI/IBC implement secure, encrypted web connections between FPPS/WTTS and NRC HQ.

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

Yes

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

The DOI owns the systems and has access to the information, and provides certain information to other agencies including the Social Security Administration, US Treasury, Thrift Investment Board, state and local tax authorities, Office of Personnel Management (OPM), and OPM contractors for health benefits, long-term care, and flexible spending accounts.

New hires and selectees for NRC positions will be granted access to EODS.

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

Access to FPPS data is limited to authorized agencies to perform functions required by law and provide benefits.

Access to EODS is restricted to selected individuals who receive a username and password to begin the on-boarding process.

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

Banking information is provided to the US Treasury to implement direct deposit for payroll. Taxable earnings and withholdings are shared with the Treasury. OPM receives biweekly personnel and benefit information relating to NRC employees.

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

FPPS information is transmitted using encrypted interface files or disks.

WTTS/EODS information is transmitted using secure, encrypted web connections.

**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> ?

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?

FPPS:

Subject to Non-Disclosure - Category 3, Non-Public Information Properly destroy in accordance with the GRS/DOI Combined Records Schedule (MS-1220, Appendix 2)

WTTS/EODS:

Old GRS Citation	New GRS Citation / Record Series	New GRS Retention
1/4a	2.1.050 Job Vacancy Case Files. Records of one-time competitive and SES announcements/selections.	Temporary. Destroy 2 years after selection certificate is closed or final settlement of any associated litigation whichever is later.
	2.1.051 Job Vacancy Case Files.. Records of standing register competitive files for multiple positions filled over a period of time.	Temporary. Destroy 2 years after termination of register.
1/4b1	2.1.060 Job application packages.	Temporary. Destroy 1 year after date of submission.
1/4b2	2.1.060	
1/4b3	2.1.060	
1/5	2.1.050 2.1.051	
1/7a1	Position Classification Standards Files <b>Rescinded per Transmittal 28</b>	Non-record technical reference in all agencies but OPM, where they are mission records.
1/7a2a	2.1.010 Classification standards.	Temporary. Destroy 2 years after standard is superseded, canceled, or disapproved by OPM (as appropriate) but longer retention is authorized if required for business use.

1/9	2.2.072 Employee performance file system records. Records of SES employees.	Temporary. Destroy no sooner than 5 years after date of appraisal, but longer retention is authorized if required for business use.
1/14a	2.2.050 Notifications of personnel actions. (Exclusion: SF-50s filed in the OPF. Items 040 and 041 of GRS 2.2 cover these records).	Temporary. Destroy when business use ceases.
1/14b	2.5.050 Phased retirement administrative records.	Temporary. Destroy when 3 years old or 3 years after revision or replacement, as appropriate, but longer retention is authorized if required for business use.
1/24a	2.3.020 Reasonable accommodation program files.	Temporary. Destroy 3 years after being superseded, but longer retention is authorized if required for business use.
1/33a	2.1.150 Records of delegation of authority for examination and certification.	Temporary. Destroy 3 years after agreement terminates but longer retention is authorized if required for business use.
1/33b	2.1.150	
1/33c	2.1.050 2.1.051	
1/33f	2.1.050 2.1.051	
1/33g	2.1.050 2.1.051	
1/33h	Letters to Applicants Denying Transfer of Eligibility <b>Rescinded per Transmittal 28</b>	OPM Form 4896 is obsolete and the entire work process no longer exists.

For further information, reference:

[NARA's General Records Schedules \(GRS\) 2.0 Human Resources](#)

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

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

**F. TECHNICAL ACCESS AND SECURITY**

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

An FPPS username and password are required to gain access, and different levels of access are authorized based on the user's job function. The FPPS password must be exactly 8 characters with at least 1 number and 1 special character consisting of @, # or \$ and must be changed every 60 days.

The same credentials are used to access WTTS, which also utilizes user roles to enforce different levels of permissions.

EODS is accessible by new hires that receive a username and password and limited access is granted to view and modify personal information.

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

Access is limited based on job function and/or assigned roles and enforced by RACF TSO (Resource Access Control Facility Time Sharing Option) for FPPS and by ColdFusion for WTTS.

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

Criteria, procedures, controls, and responsibilities will be documented in the system SSP, which will be developed during the authorization.

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

ADAMS ML18047A742 - FPPS/WTTS/EODS Subsystem Security Plan

4. **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?**

The systems are all managed by the DOI's IBC and are all accessed via the same secure web portal.

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

The NRC Payroll and Payments Branch team, the DOI payroll office, NRC Managers and NRC OCHCO office all have access to FPPS.

NRC OCHCO system administrators, HQ and regional representatives, and hiring officials have access to WTTS/EODS.

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

Yes

**a. If yes, what will be collected?**

The system records the username for FPPS transactions and the username, date and time of system access, and transaction type in WTTS/EODS.

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

The DOI's IBC is responsible for all design, development, and maintenance of the systems.

*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?**

Technical safeguards in place include separation of duties, unique IDs and passwords, and annual audits of the system.

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

Yes

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

The DOI/IBC Certification and Accreditation was completed on May 13, 2009.

## PRIVACY IMPACT ASSESSMENT REVIEW/APPROVAL

(For Use by OCIO/ISB Staff)

**System Name:** Federal Personnel Payroll System (FPPS) - Workforce Tracking and Transformation System (WTTS) - Entrance on Duty System (EODS)

**Submitting Office:** Office of the Chief Human Capital Officer

### A. PRIVACY ACT APPLICABILITY REVIEW

☐ Privacy Act is not applicable.

☒ Privacy Act is applicable.

**Comments:**

FPPS/WTTS/EODS contains Privacy Act records (data) covered under NRC-11, "General Personnel Records (Official Personnel Folder and Related Records)," NRC-21, "Payroll Accounting Records," and NRC-22, "Personnel Performance Appraisals." and NRC-28, Merit Selection Records.

Reviewer's Name	Title	Date
Sally A. Hardy	Privacy Officer	3/1/2018

### B. INFORMATION COLLECTION APPLICABILITY DETERMINATION

☐ No OMB clearance is needed.

☒ OMB clearance is needed.

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

**Comments:** The cited clearance (3206-0219) is for USAJOBS but nowhere in the PIA does it discuss what information is collected by USAJOBS. WTTS/EODS does receive information from NRCareers which does not have an OMB clearance. Also information is also collected from unnamed "various OMB approved employment forms (personnel, benefits, and payroll)." It is unclear if these forms have current OMB clearances.

Reviewer's Name	Title	Date
David Cullison	Agency Clearance Officer	2/28/18

## 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:**

Reviewer's Name	Title	Date
Marna B. Dove	Sr. Program Analyst, Electronic Records Manager	2/28/18

#### 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:

<u>/RA/</u>	Date <u>March 1, 2018</u>
Anna T. McGowan, Chief Information Services Branch Governance & Enterprise Management Services Division Office of the Chief Information Officer	

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

<b>TO:</b> Miriam Cohen, Chief Human Capital Officer, Office of the Chief Human Capital Officer	
<b>Name of System:</b> Federal Personnel Payroll System (FPPS) - Workforce Tracking and Transformation System (WTTS) - Entrance on Duty System (EODS)	
Date ISB received PIA for review: <b>February 8, 2018</b>	Date ISB completed PIA review: <b>March 1, 2018</b>
<b>Noted Issues:</b>  FPPS/WTTS/EODS contains Privacy Act records (data) covered under NRC-11, "General Personnel Records (Official Personnel Folder and Related Records)," NRC-21, "Payroll Accounting Records," and NRC-22, "Personnel Performance Appraisals." and NRC-28, Merit Selection Records.	
Anna T. McGowan, Chief Information Services Branch Governance & Enterprise Management Services Division Office of the Chief Information Officer	Signature/Date:  <b>/RA/     March 1, 2018</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 Services Division Office of the Chief Information Officer</i>	