## U.S. Nuclear Regulatory Commission



# Privacy Impact Assessment Office of the Inspector General - Investigations, Correspondence, and Audit Management System (OIG-ICAMS) Subsystem of Business Application Support System (BASS)

Office of the Chief Information Officer (OCIO)

Version 1.0 09/12/2023

#### **Instruction Notes:**

Please do not enter the PIA document into ADAMS. An ADAMS accession number will be assigned through the e-Concurrence system which will be handled by the Privacy Team

**Template Version 2.0 (03/2023)** 

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# **Document Revision History**

Date	Version	PIA Name/Description	Author
09/12/2023	1.0	Office of the Inspector General - Investigations, Correspondence, and Audit Management System (OIG-ICAMS) – Initial Release	OCIO Oasis Systems, LLC
08/17/2023	DRAFT	Office of the Inspector General - Investigations, Correspondence, and Audit Management System (OIG-ICAMS) - Draft Release	OCIO Oasis Systems, LLC

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The agency is subject to the requirements of the E-Government Act and is committed to identifying and addressing privacy risks whenever it develops or makes changes to its information systems. The questions below help determine any privacy risks related to the E-Government Act or later guidance by the Office of Management and Budget (OMB) and the National Institute of Standards and Technology (NIST).

**Name/System/Subsystem/Service Name**: Office of the Inspector General - Investigations, Correspondence, and Audit Management System (OIG-ICAMS).

Data Storage Location (i.e., Database Server, SharePoint, Cloud, Other Government Agency, Power Platform) Cloud.

Date Submitted for review/approval: October 31, 2023.

### 1 Description

1.1 Provide the description of the system/subsystem, technology (i.e., Microsoft Products), program, or other data collections (hereinafter referred to as "project"). Explain the reason the project is being created.

OIG-ICAMS is a subsystem of the Office of the Chief Information Officer (OCIO) Business Application Support System (BASS) and includes the external Information Technology (IT) service OPEXUS eCase Platform. The OPEXUS eCase Platform is provided to the U.S. Nuclear Regulatory Commission (NRC) as a Software-as-a-Service (SaaS) cloud solution by OPEXUS, Inc. The OPEXUS eCase Platform is authorized by the Federal Risk and Authorization Management Program (FedRAMP).

OPEXUS eCase is a low-code digital process automation (DPA) platform built for dynamic case management (DCM). Their innovative platform empowers agile workflow-driven tasking and decision making across diverse business areas. eCase's architecture is ideal for investigative case processing, audit management, and correspondence tracking as it enables simple configuration of case types with associated approval workflows, rules, permissions, reports, and more. The OPEXUS solution provides a native document management module to enable attachment of documents to tasks, document approval workflows, retention, and full text search. eCase provides real-time tracking and reporting on all tasks and documents within the system, collaboration tools for communication with internal and external contacts, configurable task approval workflows, and configurable rules, roles, and permissions to ensure consistent and secure processing across the enterprise.

OPEXUS maintains a FedRAMP-moderate data center, certified at the infrastructure-as-a-service (laaS) level and the eCase Platform is certified at the SaaS and platform-as-a-service (PaaS) levels. The NRC solution is to utilize the SaaS solution for eCase. OPEXUS' data center services are provided from their Top Secret cleared facility, which is compliant with FedRAMP, Federal Information Security Management Act (FISMA), National Institute of Standards and Technology (NIST), and Federal Information Processing Standard (FIPS) security provisions.

The data center provides system monitoring and redundant infrastructure via the implementation of clustered servers, uninterruptable power supplies, redundant networks,

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equipment, and other devices and methods to ensure data is fully protected. Data at rest and in transit, including connections to the database, utilize encrypted TLS protocols.

OPEXUS eCase contains the following modules:

- eCase Audit Provides a collaborative workflow-driven solution to support audit and compliance processes. The eCase Audit solution spans the complete audit lifecycle: from audit planning, audit performance, and audit follow-up to recommendation tracking and reporting. It tracks the workflow of audit events, artifacts, reports, recommendations, and corrective actions. eCase Audit features include risk-based audit planning and scoping, workpaper management, configurable workflows, audit management toolkit, team-based collaborations, time tracking, issue tracking and resolution management, role-based access and views, reports dashboards, and Key Performance Indicators.
- eCase Investigations Provides a configurable, Commercial off-the-shelf collaborative workflow-driven solution designed to automate, track, and report on the complete investigations process from hotline complaint receipt to case closure. The Hotline Portal allows public users to submit hotline complaints and assigns complaints to NRC OIG users within the eCase Investigation's system. Key stages of the investigative process automated by eCase Investigations include initial processing, review, assignment, investigation, case closure, and generating the final report of investigation. Additional features include time management, inventory management, and integrity briefings management for internal and external briefings.
- eCase Correspondence Provides a configurable, workflow-driven application designed to
  meet a variety of correspondence needs, from basic correspondence tracking and tasking to
  complex case management. eCase Correspondence includes robust document
  management out-of-the-box which captures correspondence in a case folder and adds
  associated attributes for future use/retrieval to provide agencywide tracking, document
  version control, retention management, and real-time reporting of statistical data.

Please mark appropriate response below if your project/system will involve the following:

☐ PowerApps	□ Public Website (Hotline portal only)	
☐ Dashboard	☐ Internal Website	
☐ SharePoint	☐ None	
Other: The NRC OIG-ICAMS is in a FedRAMP-authorized cloud. This is a Software-as-a-Service (SaaS) solution.		

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# 1.2 Does this privacy impact assessment (PIA) support a proposed new project, proposed modification to an existing project, or other situation? Select options that best apply in table below.

Mark appropriate response.

Status Options		
	New system/project	
	Modification to an existing system/project.  If modifying or making other updates to an existing system/project, provide the ADAMS ML of the existing PIA and describe the modification.	
$\boxtimes$	Annual Review If making minor edits to an existing system/project, briefly describe the changes below. Applying the new PIA template.	
	Other (explain)	

#### 1.3 Points of Contact:

	Project Manager	System Owner/Data Owner/Steward	ISSO	Business Project Manager	Technical Project Manager	Executive Sponsor
Name	Rick Grancorvitz	Gwen Hayden	Consuella Debnam	Ziad Buhaissi	N/A	N/A
Office /Division /Branch	Office of the Inspector General (OIG)	Office of the Chief Information Officer (OCIO)	Office of the Chief Information Officer (OCIO)	Office of the Inspector General (OIG)		
Telephone	301-287- 0805	301-287-0761	301-287- 0834	301-415- 1983		

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## 2 Authorities and Other Requirements

# 2.1 What specific legal authorities and/or agreements permit the collection of information for the project?

Provide all statutory and regulatory authorities for operating the project, including the authority to collect the information; NRC internal policy is not a legal authority. Please mark appropriate response in table below.

Mark with an "X" on all that apply.	Authority	Citation/Reference
	Statute	Inspector General Act of 1978 (as amended).
	Executive Order	
	Federal Regulation	
	Memorandum of Understanding/Agreement	
	Other (summarize and provide a copy of relevant portion)	

# 2.2 Explain how the information will be used under the authority listed above (i.e., enroll employees in a subsidies program to provide subsidy payment).

Information is collected to support the OIG's mission to (1) independently and objectively conduct and supervise audits and investigations relating to NRC and Defense Nuclear Facilities Safety Board (DNFSB)'s programs and operations; (2) prevent and detect fraud, waste, and abuse, and (3) promote economy, efficiency, and effectiveness in NRC and DNFSB's programs and operations.

If the project collects Social Security numbers, state why this is necessary and how it will be used.

OIG-ICAMS uses Social Security numbers for the purpose of conducting the investigations.

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## 3 Characterization of the Information

In the table below, mark the categories of individuals for whom information is collected.

Category of individual	
$\boxtimes$	Federal employees
$\boxtimes$	Contractors
	Members of the Public (any individual other than a federal employee, consultant, or contractor)
	Licensees
	Other:

In the table below, is a list of the most common types of PII collected. Mark all PII that is collected and stored by the project/system. If there is additional PII not defined in the table below, a comprehensive listing of PII is provided for further reference in ADAMS at the following link: PII Reference Table 2023.

	Categories of Information		
$\boxtimes$	Name	$\boxtimes$	Resume or curriculum vitae
$\boxtimes$	Date of Birth	$\boxtimes$	Driver's License Number
$\boxtimes$	Country of Birth		License Plate Number
$\boxtimes$	Citizenship	$\boxtimes$	Passport number
$\boxtimes$	Nationality		Relatives Information
$\boxtimes$	Race		Taxpayer Identification Number
$\boxtimes$	Home Address		Credit/Debit Card Number
	Social Security number (Truncated or Partial)		Medical/health information
$\boxtimes$	Gender	$\boxtimes$	Alien Registration Number
$\boxtimes$	Ethnicity		Professional/personal references
	Spouse Information	$\boxtimes$	Criminal History
$\boxtimes$	Personal e-mail address		Biometric identifiers (facial images, fingerprints, iris scans)
	Personal Bank Account Number		Emergency contact e.g., a third party to contact in case of an emergency
$\boxtimes$	Personal Mobile Number		Accommodation/disabilities information
$\boxtimes$	Marital Status		Other: Work address, employer, height,
	Children Information		weight, scars/tattoos, picture.
	Mother's Maiden Name		

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# 3.1 Describe how the data is collected for the project. (i.e., NRC Form, survey, questionnaire, existing NRC files/ databases, response to a background check).

The information is obtained from a variety of sources including, but not limited to, the individual record subject; NRC officials and employees; and NRC contractors. It could contain information obtained from any NRC sensitive but unclassified files or systems. It does not contain Classified or Safeguards information.

#### 3.2 If using a form to collect the information, provide the form number, title and/or a link.

No, information is collected in OIG-ICAMS by authorized users only. Reference documents in electronic format are attached in the system using built-in electronic data transfer mechanisms of Windows.

# 3.3 Who provides the information? Is it provided directly from the individual or a third party.

The information is obtained from a variety of sources including, but not limited to, the individual record subject; NRC and DNFSB officials and employees; employees of Federal, State, local, and foreign agencies; and other persons.

# 3.4 Explain how the accuracy of the data collection is validated. If the project does not check for accuracy, please explain why.

OIG staff that input and update information in the system are responsible for ensuring that the data entered is current, accurate, and complete. OIG-ICAMS also utilizes a variety of automated mechanisms to verify the information, including:

- Mandatory fields that must be completed before a document can be saved.
- Configurable pick lists for selecting values for key fields to ensure data consistency.
- Required management review and approval of documents, and record locking to prevent changes once documents are approved.
- Validation checks to verify that prerequisite activities were completed.

#### 3.5 Will PII data be used in a test environment? If so, explain the rationale.

No.

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

Any information deemed to be inaccurate can be relayed to OIG staff working the case. OIG staff are responsible for ensuring the data is current, accurate, and complete.

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## 4 Data Security

4.1 Describe who has access to the data in the project (i.e., internal NRC, system administrators, external agencies, contractors, public).

Access to information is limited to OIG through least privilege and separation of duties principles. The roles that have access to the data are OIG special agents, OIG investigative analysts, OIG auditors and management analysts, OIG team leaders and managers, OIG General Counsel, OIG administrative support staff, and system administrators.

4.2 If the project/system shares information with any other NRC systems, identify the system, what information is being shared and the method of sharing.

N/A.

4.3 If the project/system connects, receives, or shares information with any external non-NRC partners or systems, identify what is being shared.

N/A.

Identify what agreements are in place with the external non-NRC partner or system in the table below.

	Agreement Type	
	Contract	
	Provide Contract Number:	
	License	
	Provide License Information:	
	Memorandum of Understanding	
	Provide ADAMS ML number for MOU:	
	Other	
	S #155	
$\boxtimes$	None	

4.4 Describe how the data is accessed and describe the access control mechanisms that prevent misuse.

Logical access controls have been implemented to prevent misuse of data (i.e., unique username and password requirements). OIG-ICAMS logs user activity including the username and the date/time records were accessed, created, or modified. Access logs are reviewed by the system administrators and Subsystem ISSOs for anomalies. Attempts to access OIG-ICAMS by unauthorized users are also logged.

4.5 Explain how the data is transmitted and how confidentiality is protected (i.e., encrypting the communication or by encrypting the information before it is transmitted).

Data in transit and at rest utilize encrypted TLS security protocols.

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#### 4.6 Describe where the data is being stored (i.e., NRC, Cloud, Contractor Site).

Data is stored at the OPEXUS FedRAMP-moderate data center.

#### 4.7 Explain if the project can be accessed or operated at more than one location.

Users who have an NRC mobile desktop computer can access the OIG-ICAMS remotely through NRC's Virtual Private Network (VPN).

#### 4.8 Can the project be accessed by a contractor? If so, do they possess an NRC badge?

OIG-ICAMS data is available only to authorized personnel who have a need to know and whose duties require access to the information.

## 4.9 Explain the auditing measures and technical safeguards in place to prevent misuse of data.

Logical access controls have been implemented to prevent misuse of data (i.e., unique username and password requirements). OIG-ICAMS logs user activity including the username and the date/time records were accessed, created, or modified. Access logs are reviewed by the system administrators and subsystem ISSOs for anomalies. Attempts to access OIG-ICAMS by unauthorized users are also logged.

# 4.10 Describe if the project has the capability to identify, locate, and monitor (i.e., trace/track/observe) individuals.

No.

#### 4.11 Define which FISMA boundary this project is part of.

OIG-ICAMS is a subsystem of the Office of the Chief Information Officer (OCIO) Business Application Support System (BASS).

#### 4.12 Is there an Authority to Operate (ATO) associated with this project/system?

	Authorization Status		
	Unknown		
	No If no, please note that the authorization status must be reported to the Chief Information Security Officer (CISO) and Computer Security Organization (CSO's) Point of Contact (POC) via e-mail quarterly to ensure the authorization remains on track.		
	In Progress provide the estimated date to receive an ATO. Estimated date:		
$\boxtimes$	Yes Indicate the data impact levels (Low, Moderate, High, Undefined) approved by the Chief Information Security Officer (CISO)		

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Confidentiality Moderate	

Confidentiality-Moderate
Integrity- Moderate
Availability- Moderate

4.13 Provide the NRC system Enterprise Architecture (EA)/Inventory number. If unknown, contact <u>EA Service Desk</u> to get the EA/Inventory number.

20050018.

## 5 Privacy Act Determination

5.1 Is the data collected retrieved by a personal identifier?

Mark the appropriate response.

	Response	
	Yes, the PII is retrieved by a personal identifier (i.e., individual's name, address, SSN, etc.)	
	List the identifiers that will be used to retrieve the information on the individual.	
$\boxtimes$	No, the PII is not retrieved by a personal identifier.	
	If no, explain how the data is retrieved from the project.	
	Investigations, correspondence, and audit information will be retrieved by a folder id. In investigations, the unique folder id will correspond to a complaint, or an investigation. In correspondence, the unique folder id will correspond to a unique correspondence number. In audit information, the folder id will correspond to a unique audit number. There will be options to retrieve contact information by First Name, Last Name, email, or address.	

5.2 For all collections where the information is retrieved by a personal identifier, the Privacy Act requires that the agency publish a System of Record Notice (SORN) in the Federal Register. As per the Privacy Act of 1974, "the term 'system of records' means a group of any records under the control of any agency from which information is retrieved by the name of the individual or by some other personal identifier assigned to the individual.

Mark the appropriate response in the table below.

Response
Yes, this system is covered by an existing SORN. (See existing SORNs: <a href="https://www.nrc.gov/reading-rm/foia/privacy-systems.html">https://www.nrc.gov/reading-rm/foia/privacy-systems.html</a> )
Provide the SORN name, number, (List all SORNs that apply):  NRC 18 – Office of the Inspector General (OIG) Investigative Records –  NRC and Defense Nuclear Facilities Safety Board (DNFSB) located at
https://www.nrc.gov/docs/ML2002/ML20022A239.pdf

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Response	
	SORN is in progress
	SORN needs to be created
	Unaware of an existing SORN
	No, this system is not a system of records and a SORN is not applicable.

## 5.3 When an individual is asked to provide personal data (i.e., form, webpage, survey), is a Privacy Act Statement (PAS) provided?

A Privacy Act Statement is a disclosure statement required to appear on documents used by agencies when an individual is asked to provide personal data. It is required for any forms, surveys, or other documents, including electronic forms, used to solicit personal information from individuals that will be maintained in a system of records.

Mark the appropriate response.

Options			
	Privacy Act Statement		
$\boxtimes$	- Federal Acquisition Regulation (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.		
	Not Applicable		
	Unknown		

5.4 Is providing the PII mandatory or voluntary? What is the effect on the individual by not providing the information?

Providing PII is Mandatory.

# 6 Records and Information Management-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

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significance). Records/data and information with historical value, identified as having a "permanent" disposition, are transferred to the National Archives of the United States at the end of their retention period. All other records identified as having a "temporary" disposition are destroyed at the end of their retention period in accordance with the NARA Records Schedule or the General Records Schedule.

These determinations are made through records retention schedules and NARA statutes (44 United States Code (U.S.C.), 36 Code of Federation Regulations (CFR)). Under 36 CFR, agencies are required to establish procedures for addressing Records and Information Management (RIM) requirements. This includes strategies for establishing and managing recordkeeping requirements and disposition instructions before approving new electronic information systems or enhancements to existing systems.

The following questions are intended to determine whether the records/data and information in the system have approved records retention schedules and disposition instructions, whether the system incorporates RIM strategies including support for <a href="NARA's Universal Electronic Records">NARA's Universal Electronic Records</a> <a href="Management (ERM) requirements">Management (ERM) requirements</a>, and if a mitigation strategy is needed to ensure compliance.

#### If the project/system:

- Does not have an approved records retention schedule and/or
- Does not have an automated RIM functionality,
- Involves a cloud solution,
- And/or if there are additional questions regarding Records and Information Management
   Retention and Disposal, please contact the NRC Records staff at
   ITIMPolicy.Resource@nrc.gov for further guidance.

If the project/system has a record retention schedule or an automated RIM functionality, please complete the questions below.

6.1 Does this project map to an applicable retention schedule in NRC's Comprehensive Records Disposition Schedule (NUREG-0910), or NARA's General Records Schedules?

$\boxtimes$	NUREG-0910, "NRC Comprehensive Records Disposition Schedule
$\boxtimes$	NARA's General Records Schedules
	Unscheduled

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# 6.2 If so, cite the schedule number, approved disposition, and describe how this is accomplished.

System Name (include sub-systems, platforms, or other locations where the same data resides)	A records retention and disposition schedule (N1-431-10-002) for OIG records, including OIG-ICAMS, was approved by the Archivist of the United States on September 16, 2014. There are multiple items associated with this schedule containing both Permanent and Temporary items.
Records Retention Schedule Number(s)	GRS 3.2 item 010 – Systems and data security records
Approved Disposition Instructions	Item 010: Temporary. Destroy 1 year(s) after system is superseded by a new iteration or when no longer needed for agency/IT administrative purposes to ensure a continuity of security controls throughout the life of the system.
Is there a current automated functionality or a manual process to support RIM requirements? This includes the ability to apply records retention and disposition policies in the system(s) to support records accessibility, reliability, integrity, and disposition.	N/A
Disposition of Temporary Records  Will the records/data or a composite be automatically or manually deleted once they reach their approved retention?	N/A
Disposition of Permanent Records	N/A
Will the records be exported to an approved format and transferred to the National Archives based on approved retention and disposition instructions?	
If so, what formats will be used?	
NRC Transfer Guidance (Information and Records Management Guideline - IRMG)	

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## 7 Paperwork Reduction Act

The Paperwork Reduction Act (PRA) of 1995 requires that agencies obtain an Office of Management and Budget (OMB) approval in the form of a "control number"—before promulgating a paper form, website, surveys, questionnaires, or electronic submission from 10 or members of the public. If the data collection is from federal employees regarding work-related duties, then a PRA clearance is not necessary.

# 7.1 Will the project be collecting any information from 10 or more persons who are not Federal employees?

The Inspector General Empowerment Act of 2016 amended the Inspector General Act of 1978 to exempt Inspector General information collection activities related to an audit, investigation, or other review from Paperwork Reduction Act requirements.

# 7.2 Is there any collection of information addressed to all or a substantial majority of an industry (i.e., Fuel Fabrication Facilities or Fuel Cycle Facilities)?

N/A.

#### 7.3 Is the collection of information required by a rule of general applicability?

The Paperwork Reduction Act does not apply to the conduct of a Federal criminal investigation or during the conduct of an Administrative action, investigation, or audit involving an agency or specific individuals or entities.

Note: For information collection (OMB clearances) questions: contact the NRC's Clearance Officer. Additional guidance can be found on the NRC's internal Information Collections Web page at: <a href="https://intranet.nrc.gov/ocio/33456">https://intranet.nrc.gov/ocio/33456</a>.

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## 8 Privacy Act Determination

Project/System Name: Office of the Inspector General - Investigations, Correspondence, and

Audit Management System (OIG-ICAMS).

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

## **Privacy Officer Review**

	Review Results	Action Items
	This project/system does not contain PII.	<b>No further action</b> is necessary for Privacy.
	This project/system <b>does contain PII</b> ; the Privacy Act does <b>NOT</b> apply, since information is NOT retrieved by a personal identifier.	Must be protected with restricted access to those with a valid need-to-know.
$\boxtimes$	This project/system does contain PII; the Privacy Act does apply.	SORN is required- Information is retrieved by a personal identifier.

#### **Comments:**

NRC 18 – Office of the Inspector General (OIG) Investigative Records – NRC and Defense Nuclear Facilities Safety Board (DNFSB)

Reviewer's Name	Title
Signed by Hardy, Sally on 11/21/23	Privacy Officer

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## 9 OMB Clearance Determination

## **NRC Clearance Officer Review**

Review Results		
$\boxtimes$	No OMB clearance is needed.	
	OMB clearance is needed.	
	Currently has OMB Clearance. Clearance No	

#### **Comments:**

Reviewer's Name	Title
Signed by Cullison, David on 11/06/23	Agency Clearance Officer

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# 10 Records Retention and Disposal Schedule Determination Records Information Management Review

Review Results	
	No record schedule required.
$\boxtimes$	Additional information is needed to complete assessment.
	Needs to be scheduled.
$\boxtimes$	Existing records retention and disposition schedule covers the system - no modifications needed.

#### **Comments:**

Reviewer's Name	Title
Signed by Dove, Marna on 11/15/23	Sr. Program Analyst, Electronic Records Manager

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## 11 Branch Chief Review and Concurrence

Review Results	
	This project/system <b>does not</b> collect, maintain, or disseminate information in identifiable form.
$\boxtimes$	This project/system <b>does</b> collect, maintain, or disseminate information in identifiable form.
$\boxtimes$	I concur with the Privacy Act, Information Collections, and Records Management reviews.

Signed by Feibus, Jonathan on 11/21/23

Chief Information Security Officer Chief Information Security Division Office of the Chief Information Officer

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## **ADDITIONAL ACTION ITEMS/CONCERNS**

Name of Project/System: Office of the Inspector General - Investigations, Correspondence, and Audit Management System (OIG-ICAMS)		
Date CISD received PIA for review:	Date CISD completed PIA review:	
October 31, 2023	November 21, 2023	
Action Items/Concerns:		
Copies of this PIA will be provided to:		
Caroline Carusone		
Director	ion	
IT Services Development and Operations Division Office of the Chief Information Officer	ion	
Garo Nalabandian		
Deputy		
Chief Information Security Officer (CISO)		
Office of the Chief Information Officer		