
U.S. Nuclear Regulatory Commission



**Privacy Impact Assessment
Drug Testing Tracking System (DTTS)**

Office of Administration (ADM)

Version 1.0

9/15/2023

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| Drug Testing Tracking System (DTTS) | Version 1.0 |
| Privacy Impact Assessment | 9/15/2023 |

Document Revision History

| Date | Version | PIA Name/Description | Author |
|-----------|---------|-----------------------------|---------------------------|
| 9/15/2023 | 1.0 | DTTS PIA - Initial Release. | ADM Oasis Systems, LLC |
| 8/242023 | DRAFT | DTTS PIA - Draft Release. | ADM 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: Drug Testing Tracking System (DTTS).

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

Date Submitted for review/approval: September 15, 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.

DTTS is a case management and random drug pool generation system that is currently used to track drug testing records and generate random drug test pools. DTTS is a client application that sits on a workstation, located in the secure Drug Testing Program (DTP) Office.

DTTS key functionalities include:

- Generating random drug testing pools (NRC HQ, Regional Offices, and the Technical Training Center [TTC])
- Monitoring drug test dates and results
- Providing management and statistical reports

DTTS is operated and managed by the Office of Administration (ADM) DTP Office staff for the purpose of managing and monitoring the drug testing program at the NRC for employees and contractors.

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

| | |
|-------------------------------------|---|
| <input type="checkbox"/> PowerApps | <input type="checkbox"/> Public Website |
| <input type="checkbox"/> Dashboard | <input type="checkbox"/> Internal Website |
| <input type="checkbox"/> SharePoint | <input checked="" type="checkbox"/> None |
| <input type="checkbox"/> Other: | |

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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 | |
|-------------------------------------|--|
| <input type="checkbox"/> | New system/project |
| <input checked="" type="checkbox"/> | Modification to an existing system/project. The DTTS system environment was changed during FY23 to improve system management and security. ADAMS ML: ML20288A500 |
| <input type="checkbox"/> | Annual Review <i>If making minor edits to an existing system/project, briefly describe the changes below.</i> |
| <input type="checkbox"/> | Other (explain) |

1.3 Points of Contact:

| | Project Manager | System Owner/Data Owner/Steward | ISSO | Business Project Manager | Technical Project Manager | Executive Sponsor |
|---------------------------------|------------------|---------------------------------|---------------|--------------------------|---------------------------|-------------------|
| Name | Jackie Nicholson | Jennifer Golder | Zia Anderson | N/A | N/A | N/A |
| Office /Division /Branch | ADM/DFS/PSB | ADM | ADM/DRMA/BITT | N/A | N/A | N/A |
| Telephone | 301-415-2095 | 301-287-0741 | N/A | N/A | N/A | N/A |

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 |
|-------------------------------------|--|--|
| <input checked="" type="checkbox"/> | Statute | Section 503 of Public Law 100-71; 5 United States Code (U.S.C.) 3301 (2); and 5 U.S.C. 7301. |
| <input checked="" type="checkbox"/> | Executive Order | Executive Order (E.O.) 12564 |
| <input type="checkbox"/> | Federal Regulation | |
| <input type="checkbox"/> | Memorandum of Understanding/Agreement | |
| <input type="checkbox"/> | Other (summarize and | |

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| | provide a copy of relevant portion) | |
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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).

Data in the system is used to determine if an employee or contractor in a sensitive position is suitable for Government employment. In addition to pre-employment drug testing, DTTS is used to support random drug testing of NRC employees and consultants.

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

The last three digits of the Social Security Number (SSN) are used to identify drug test records unique to the donor to ensure individuals are suitable for NRC employment.

3 Characterization of the Information

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

| Category of individual | |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | Federal employees |
| <input checked="" type="checkbox"/> | Contractors |
| <input type="checkbox"/> | Members of the Public (any individual other than a federal employee, consultant, or contractor) |
| <input type="checkbox"/> | Licensees |
| <input checked="" type="checkbox"/> | Other: Employment Applicants and Consultants. |

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 | | | |
|-------------------------------------|---|--------------------------|----------------------------------|
| <input checked="" type="checkbox"/> | Name | <input type="checkbox"/> | Resume or curriculum vitae |
| <input checked="" type="checkbox"/> | Date of Birth | <input type="checkbox"/> | Driver's License Number |
| <input type="checkbox"/> | Country of Birth | <input type="checkbox"/> | License Plate Number |
| <input type="checkbox"/> | Citizenship | <input type="checkbox"/> | Passport number |
| <input type="checkbox"/> | Nationality | <input type="checkbox"/> | Relatives Information |
| <input type="checkbox"/> | Race | <input type="checkbox"/> | Taxpayer Identification Number |
| <input type="checkbox"/> | Home Address | <input type="checkbox"/> | Credit/Debit Card Number |
| <input checked="" type="checkbox"/> | Social Security Number (Truncated or Partial) | <input type="checkbox"/> | Medical/health information |
| <input type="checkbox"/> | Gender | <input type="checkbox"/> | Alien Registration Number |
| <input type="checkbox"/> | Ethnicity | <input type="checkbox"/> | Professional/personal references |

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| Categories of Information | | | |
|---------------------------|------------------------------|-------------------------------------|--|
| <input type="checkbox"/> | Spouse Information | <input type="checkbox"/> | Criminal History |
| <input type="checkbox"/> | Personal e-mail address | <input type="checkbox"/> | Biometric identifiers (e.g., facial images, fingerprints, iris scans) |
| <input type="checkbox"/> | Personal Bank Account Number | <input type="checkbox"/> | Emergency contact (e.g., a third party to contact in case of an emergency) |
| <input type="checkbox"/> | Personal Mobile Number | <input type="checkbox"/> | Accommodation/disabilities information |
| <input type="checkbox"/> | Marital Status | <input checked="" type="checkbox"/> | Other: Drug test dates and results. |
| <input type="checkbox"/> | Children Information | | |
| <input type="checkbox"/> | Mother's Maiden Name | | |

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).

For pre-employment drug tests, the individual's supervisor/contract office representative (COR) works with the DTP to coordinate test dates and times. For random drug tests of NRC employees, one to three times a year, the DTP Office selects random drug test pools, using the most up-to-date personnel list provided by the Office of the Chief Human Capital Officer (OCHCO) that is manually loaded into the application.

On the testing day/time, the DTP staff member administering the drug test manually transfers the individual's name and date of birth (DOB) from the OCHCO-provided list onto the Federal Drug Testing Custody and Control Form. The subject individual verifies their name and DOB, and voluntarily provides the last three digits of their SSN for use on the form. The donor chain-of-custody form (containing specimen ID number and the last three of the SSN) and urine sample are sent for laboratory testing. The donor's name is not provided to the testing laboratory; the sample is uniquely identified by specimen ID and the last three of the SSN.

The NRC Medical Review Officer (MRO) receives drug test results and the chain-of-custody form from the laboratory, analyzes the results, and sends the information to the DTP Office. This information is entered into the drug testing application by DTP staff. Additionally, the individual's drug testing date and results are entered into PSATS only in the event of a positive drug test.

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

Department of Health and Human Services (HHS) Federal Drug Testing Custody and Control Form.

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

Refer above to section 3.1.

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

Individual identifying information (name, DOB, and last three of the SSN) is cross checked from the Federal Drug Testing Custody and Control Form. The multi-part form contains specimen ID

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number and donor information (last three of the SSN) that ties the urine specimen with the correct donor, and this information is verified by the donor at the time of collection. The Federal Drug Testing Custody and Control Form is signed by the individual to certify accuracy.

Additionally, when the individual's positive drug test results are entered into PSATS and the drug testing application, individual identifying information is cross-checked to ensure the drug test results are associated with the appropriate donor.

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

N/A.

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

In the event information provided on the Federal Drug Testing Custody and Control Form is inaccurate, an Affidavit must be completed, noting a correction.

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 the drug testing application is restricted, only accessible to authorized DTP staff.

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.

If an individual's drug test produces a positive result, drug test dates and results are entered into PSATS.

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 | |
|-------------------------------------|---|
| <input type="checkbox"/> | Contract Provide Contract Number: |
| <input type="checkbox"/> | License Provide License Information: |
| <input type="checkbox"/> | Memorandum of Understanding Provide ADAMS ML number for MOU: |
| <input type="checkbox"/> | Other |
| <input checked="" type="checkbox"/> | None |

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

The workstation is located in the locked DTP office; only DTP staff have keys/combination to the office. Access to the DTTS application is limited to the DTP staff, who are required to login to the system with a user ID and password.

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).

DTTS has limited network connectivity, all drug testing data is moved into and out of the system manually.

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

Drug testing information is stored at the NRC.

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

N/A.

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

Yes, all NRC contractors accessing DTTS are NRC badged personnel.

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

There is an audit trail of system access, data insert, update, and delete. Additionally, audit trails of system activity are built into the application.

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

N/A.

4.11 Define which FISMA boundary this project is part of.

DTTS is included as a subsystem of the Moderate ADM Support System (MASS) FISMA boundary.

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

| Authorization Status | |
|-------------------------------------|--|
| <input type="checkbox"/> | Unknown |
| <input type="checkbox"/> | No <i>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.</i> |
| <input type="checkbox"/> | In Progress provide the estimated date to receive an ATO. Estimated date: |
| <input checked="" type="checkbox"/> | Yes Indicate the data impact levels (Low, Moderate, High, Undefined) approved by the |

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| Authorization Status | |
|----------------------|---|
| | Chief Information Security Officer (CISO) Confidentiality – Moderate Integrity – Moderate Availability – Low |

4.13 Provide the NRC system Enterprise Architecture (EA)/Inventory number. If unknown, contact [EA Service Desk](#) to get the EA/Inventory number.

EA Number: 20190033.

5 Privacy Act Determination

5.1 Is the data collected retrieved by a personal identifier?

Mark the appropriate response.

| Response | |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | Yes, the PII is retrieved by a personal identifier (i.e., individual’s name, address, SSN, etc.) |
| <input checked="" type="checkbox"/> | List the identifiers that will be used to retrieve the information on the individual. Information about an individual in DTTS is retrieved using their name and/or SSN. |
| <input type="checkbox"/> | No, the PII is not retrieved by a personal identifier. If no, explain how the data is retrieved from the project. |

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 | |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | Yes, this system is covered by an existing SORN. (See existing SORNs: https://www.nrc.gov/reading-rm/foia/privacy-systems.html) Provide the SORN name, number, (List all SORNs that apply): NRC SORN-35 – “Drug Testing Program Records” |
| <input type="checkbox"/> | SORN is in progress |
| <input type="checkbox"/> | SORN needs to be created |
| <input type="checkbox"/> | Unaware of an existing SORN |
| <input type="checkbox"/> | No, this system is not a system of records and a SORN is not applicable. |

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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 | |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | Privacy Act Statement: HHS Federal Drug Testing Custody and Control Form (OMB No. 0930-0158). |
| <input type="checkbox"/> | Not Applicable |
| <input type="checkbox"/> | Unknown |

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

PII disclosure is mandatory, needed to uniquely identify the employee/applicant to support their initial or continuing eligibility for a security clearance and/or NRC access authorization.

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 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 [NARA’s Universal Electronic Records Management \(ERM\) requirements](#), and if a mitigation strategy is needed to ensure compliance.

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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?

| | |
|-------------------------------------|--|
| <input type="checkbox"/> | NUREG-0910, “NRC Comprehensive Records Disposition Schedule” |
| <input checked="" type="checkbox"/> | NARA’s General Records Schedules |
| <input type="checkbox"/> | Unscheduled |

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) | DTTS |
| Records Retention Schedule Number(s) | <p>GRS 2.1 Employee Acquisition Records</p> <p>GRS 2.1 Item 050 – “Job vacancy case files. Records of one-time competitive and Senior Executive Service announcement/elections.”</p> <p>GRS 2.1 Item 051 – “Job vacancy case files. Records of standing register competitive files for multiple positions filled over a period of times.”</p> <p>GRS 2.7 Employee Health and Safety Records</p> <p>GRS 2.7 Item 100 – “Employee drug test plan, procedures, and scheduling records.”</p> <p>GRS 2.7 Item 110 – “Employee drug test acknowledgment of notice forms.”</p> <p>GRS 2.7 Item 120 – “Employee drug testing specimen records.”</p> <p>GRS 2.7 Item 130 – “Employee drug test results. Positive results.”</p> <p>GRS 2.7 Item 131 – “Employee drug test</p> |

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|---|---|
| | results. Negative results.” |
| Approved Disposition Instructions | <p><u>Employee Acquisition Records</u></p> <p><u>GRS 2.1 Item 050:</u> Temporary. Destroy 2 years after selection certificate is closed or final settlement of any associated litigation, whichever is later.</p> <p><u>GRS 2.1 Item 051:</u> Temporary. Destroy 2 years after termination of register.</p> <p><u>Employee Health and Safety Records</u></p> <p><u>GRS 2.7 Item 100:</u> Temporary. Destroy when 3 years old or when superseded or obsolete.</p> <p><u>GRS 2.7 Item 110:</u> Temporary. Destroy when employee separates from testing-designated position.</p> <p><u>GRS 2.7 Item 120:</u> Temporary. Destroy 3 years after date of last entry or when 3 years old, whichever is later.</p> <p><u>GRS 2.7 Item 130:</u> Temporary. Destroy when employee leaves the agency or when 3 years old, whichever is later.</p> <p><u>GRS 2.7 Item 131:</u> Temporary. Destroy when 3 years old.</p> |
| 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. | <p>The DTP Office retains a copy of the Federal Drug Testing Custody and Control Form in their secure office for three years; after which point, it is manually disposed of and destroyed by ADM.</p> <p>The drug testing application does not implement an automated functionality to support records retention and disposition requirements.</p> |
| Disposition of Temporary Records Will the records/data or a composite be automatically or manually deleted once they reach their approved retention? | <p>The DTP Office retains a copy of the Federal Drug Testing Custody and Control Form in their secure office for three years; after which point, it is manually disposed of and destroyed by ADM.</p> <p>Drug test records stored in the application are</p> |

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| | not deleted. |
| <p>Disposition of Permanent Records</p> <p>Will the records be exported to an approved format and transferred to the National Archives based on approved retention and disposition instructions?</p> <p>If so, what formats will be used?</p> <p>NRC Transfer Guidance (Information and Records Management Guideline - IRMG)</p> | No. |

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 more 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?

Yes, DTP staff receive the information from the individual's COR/supervisor (for new employees/applicants). Information is transferred to the HHS Federal Drug Testing Custody and Control Form (OMB No. 0930-0158) and verified during testing.

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)?

No.

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

No.

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: <https://intranet.nrc.gov/ocio/33456>.

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8 Privacy Act Determination

Project/System Name: Drug Testing Tracking System (DTTS)

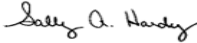
Submitting Office: Office of Administration (ADM)

Privacy Officer Review

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

Comments:

Covered by NRC SORN-35 – Drug Testing Program Records

| Reviewer's Name | Title |
|---|-----------------|
|  Signed by Hardy, Sally on 01/03/24 | Privacy Officer |

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9 OMB Clearance Determination

NRC Clearance Officer Review

| Review Results | |
|-------------------------------------|---|
| <input type="checkbox"/> | No OMB clearance is needed. |
| <input type="checkbox"/> | OMB clearance is needed. |
| <input checked="" type="checkbox"/> | Currently has OMB Clearance. Clearance No. <u>0930-0158</u> |

Comments:

The HHS Federal Drug Testing Custody and Control Form is covered by an HHS/SAMHSA clearance (OMB Control number 0930-0158).


| Reviewer's Name | Title |
|--|--------------------------|
|  Signed by Cullison, David on 12/26/23 | Agency Clearance Officer |

10 Records Retention and Disposal Schedule Determination

Records Information Management Review

| Review Results | |
|-------------------------------------|--|
| <input type="checkbox"/> | No record schedule required. |
| <input type="checkbox"/> | Additional information is needed to complete assessment. |
| <input type="checkbox"/> | Needs to be scheduled. |
| <input checked="" type="checkbox"/> | Existing records retention and disposition schedule covers the system - no modifications needed. |

Comments:

| Reviewer's Name | Title |
|--|--|
|  Signed by Dove, Marna on 12/20/23 | Sr. Program Analyst, Electronic Records Manager |

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| <input type="checkbox"/> | This project/system does not collect, maintain, or disseminate information in identifiable form. |
| <input checked="" type="checkbox"/> | This project/system does collect, maintain, or disseminate information in identifiable form. |
| <input checked="" type="checkbox"/> | I concur with the Privacy Act, Information Collections, and Records Management reviews. |



Signed by Feibus, Jonathan
on 01/03/24

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

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ADDITIONAL ACTION ITEMS/CONCERNS

| | |
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| Name of Project/System: Drug Testing Tracking System (DTTS) | |
| Date CISD received PIA for review: September 15, 2023 | Date CISD completed PIA review: December 29, 2023 |
| Action Items/Concerns: | |
| <p><i>Copies of this PIA will be provided to:</i></p> <p><i>Caroline Carusone</i> <i>Director</i> <i>IT Services Development and Operations Division</i> <i>Office of the Chief Information Officer</i></p> <p><i>Garo Nalabandian</i> <i>Deputy</i> <i>Chief Information Security Officer (CISO)</i> <i>Office of the Chief Information Officer</i></p> | |