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# U.S. Nuclear Regulatory Commission

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## **Privacy Impact Assessment**

### **Enterprise File Synchronization and Sharing (EFSS) Office of the Chief Information Officer (OCIO)**

**Version 1.0  
12/08/2023**

Enterprise File Synchronization and Sharing (EFSS)	Version 1.0
Privacy Impact Assessment	12/08/2023

## Document Revision History

Date	Version	PIA Name/Description	Author
12/08/2023	1.0	Enterprise File Synchronization and Sharing (EFSS) – Final Release	OCIO Oasis Systems, LLC
11/15/2023	DRAFT	Enterprise File Synchronization and Sharing (EFSS) - 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:** Enterprise File Synchronization and Sharing (EFSS).

**Data Storage Location (i.e., Database Server, SharePoint, Cloud, Other Government Agency, Power Platform):** The EFSS system is hosted by Box, Inc. in a secure cloud environment.

**Date Submitted for review/approval:** December 13, 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.**

The Enterprise File Synchronization and Sharing (EFSS) system is a cloud-based system that enables collaborative authoring and sharing of documents on a secure collaboration platform (Box) hosted by Box, Inc. EFSS is the U.S. Nuclear Regulatory Commission’s (NRC)’s implementation of the Box Software as a Service (SaaS) solution.

EFSS provides a secure method for collaboration and sharing of documents between the NRC internal users (NRC staff and contractors) and authorized external parties, including but not limited to: NRC licensees, other Federal agencies, and NRC job applicants. EFSS allows collaboration in an online folder system and makes it effective across devices, teams, and organizations. The system is not permitted to be used for long-term storage of agency documents and is set to retain documents for 120 days by default. An extended retention period can be approved for specific projects based on the business justification.

EFSS is accessible through a web browser; it does not require any additional software or hardware to be installed by the user. In addition, EFSS users have the option to use Box Edit, an add-on feature that allows users to open and edit files stored in EFSS using the default applications (desktop Microsoft Office applications) installed on their computers.

The NRC internal users are authenticated to the Box Platform through the NRC Identity, Credential, and Access Management (ICAM) Authentication Gateway’s Single Sign-on (SSO). Once authenticated, users with elevated privileges can create folders in EFSS, upload files, and invite external partners to view/edit files to facilitate collaboration. External recipients must accept the invitation sent via email by the system and create an account in the Box Platform within 90 days in order to access EFSS content. The Office of the Chief Information Officer (OCIO) EFSS system administrator (SYS ADMIN), NRC Program Office (Office) EFSS administrators (Office ADMINS), and internal collaborators have the ability to establish file and folder permissions such as read-only, no print, write, and access expiration based on their account privileges.

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The OCIO System Administrator will create a root folder for each Office upon request from that Office. Each Office will have the ability to manage the file and folder permissions within their root folder. The Office ADMINS can give users co- owner rights for sub-folders under the root folder within EFSS that allow the user to establish external collaboration projects and upload documents to the subfolder(s) for access by external parties.

EFSS is a subsystem of the OCIO Third Party System (TPS). TPS provides a framework for managing cybersecurity compliance for the external IT services used by NRC. TPS and its subsystems have no technical components on the NRC infrastructure.

**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 type="checkbox"/> None
<input checked="" type="checkbox"/> Other: Cloud-based system	

**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 type="checkbox"/>	Modification to an existing system/project. <i>If modifying or making other updates to an existing system/project, provide the ADAMS ML of the existing PIA and describe the modification.</i>
<input checked="" type="checkbox"/>	Annual Review <i>If making minor edits to an existing system/project, briefly describe the changes below.</i> The PIA has been transferred into the latest template.
<input type="checkbox"/>	Other (explain)

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### 1.3 Points of Contact:

	Project Manager	System Owner/Data Owner/Steward	ISSO	Business Project Manager	Technical Project Manager	Executive Sponsor
<b>Name</b>	Roy Choudhury	Caroline Carusone	Natalya Bobryakova	N/A	Roy Choudhury	Caroline Carusone
<b>Office /Division /Branch</b>	Office of the Chief Information Officer (OCIO) / IT Services Development & Operations Division (ITSDOD) / Application Development Services Branch (ADSB) / Cross-Cutting Applications Team (CCAT)	Office of the Chief Information Officer (OCIO) / IT Services Development & Operations Division (ITSDOD)	Office of the Chief Information Officer (OCIO) / Cyber and Infrastructure Security Division (CISD)	N/A	Office of the Chief Information Officer (OCIO) / IT Services Development & Operations Division (ITSDOD) / Application Development Services Branch (ADSB) / Cross-Cutting Applications Team (CCAT)	Office of the Chief Information Officer (OCIO) / IT Services Development & Operations Division (ITSDOD)
<b>Telephone</b>	301-415-7226	301-415-1085	301-287-0671	N/A	301-415-7226	301-415-1085

## 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 type="checkbox"/>	Statute	
<input type="checkbox"/>	Executive Order	
<input type="checkbox"/>	Federal Regulation	
<input type="checkbox"/>	Memorandum of Understanding/Agreement	

Mark with an "X" on all that apply.	Authority	Citation/Reference
<input checked="" type="checkbox"/>	<b>Other (summarize and provide a copy of relevant portion)</b>	Part of the NRC's mission is official information dissemination, i.e., to share information from NRC staff members to authorized external users that rely on NRC-provided information. EFSS supports secure file sharing and collaboration for NRC users that need to collaborate with parties and organizations outside the NRC. Box provides a cloud platform that ensures the secure transmission of information shared with external parties.

**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*).**

All data stored in EFSS is used solely for the purpose of sharing and collaborating with authorized external parties in support of the NRC mission.

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

The files placed in EFSS may contain Social Security numbers if this is necessary for information sharing with authorized users in support of business functions. This information can be retained in the system for no longer than 120 days, unless a business justified exception for longer retention is approved by the NRC.

### 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 checked="" type="checkbox"/>	Licensees
<input type="checkbox"/>	<b>Other</b>

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 checked="" 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 checked="" 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
<input type="checkbox"/>	Spouse Information	<input type="checkbox"/>	Criminal History
<input type="checkbox"/>	Personal email address	<input type="checkbox"/>	Biometric identifiers (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"/>	<b>Other:</b> The files placed in EFSS may contain any identifiable information about an individual if it is needed for business functions. This information may include an individual's name, address, phone number, date of birth, place of birth, social security number, or driver's license number; and any other information that is linkable to an individual, such as employment information.
<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).**

The information shared in EFSS may originate from other NRC systems or databases. However, EFSS is not directly interconnected with any other systems. The information shared in EFSS can originate from any existing NRC file, database, or information system.

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

N/A.

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

The files placed in EFSS may contain information collected from the subject individual or from



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other parties on behalf of an individual. However, in most cases, this information is collected outside of EFSS.

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

Each Office / NRC Region is responsible for verifying the information they upload to/download from EFSS.

**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?**

N/A.

## **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).**

NRC staff and contractors including system administrators and authorized external parties (NRC licensees, other Federal agencies, and NRC job applicants) have access to the data in EFSS. The EFSS SYS ADMIN creates the root folders for all NRC Offices and will have access to view files and folders from all Office folders. Each Office ADMIN will have access to all data within their Office root folder and will have the ability to set access permissions for sub-folders within each Office.

**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.**

EFSS does not directly interconnect with other NRC systems. However, the information downloaded from EFSS by NRC users may be uploaded to other NRC systems if this is needed for business functions.

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

EFSS is a file sharing and collaboration tool used to share data with authorized parties outside of the agency which can include other agencies, organizations, and licensees.

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**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

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

All internal users sign in through the agency's ICAM Authentication Gateway SSO solution. The external users sign in through a Multi-factor Authentication (MFA) enforced by Box. Users can only access data that they have been given permission to access by a user with co-owner rights to a file or folder. Access to any data in the system will be based on the individual user's permissions for collaboration projects.

**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).**

The EFSS internal and external users upload/download the files to/from EFSS using secure file transfer over a HyperText Transfer Protocol Secure (HTTPS) connection which encrypts data during transmission.

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

The data is stored in the Box cloud platform that is authorized by the Federal Risk and Authorization Management Program (FedRAMP).

**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?**

Box, Inc., the Cloud Service Provider (CSP), employs contractors in the design, development, and maintenance of their cloud platform. NRC internal contractors support the implementation and maintenance of EFSS on the Box cloud platform. The NRC contractors possess an NRC badge. The CSP's personnel do not possess an NRC badge.

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

The NRC Security Operations Center (SOC) monitor the EFSS audit logs and alerts to prevent misuse of data. Audit logs capture user and administrator activities within EFSS as well as the date and time of the events. The NRC users must comply with the EFSS Rules of Behavior and any applicable NRC policies, procedures, and rules governing the use of the NRC information technology resources. The external users have only the minimum level of access granted by the NRC system administrators.

**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.**

EFSS is a subsystem of the NRC's Third-Party System (TPS).

**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 email 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 Chief Information Security Officer (CISO) Confidentiality-Moderate Integrity-Moderate Availability-Moderate

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

EFSS is a subsystem of TPS. The TPS EA number is 20180002.

## 5 Privacy Act Determination

### 5.1 Is the data collected retrieved by a personal identifier?

Mark the appropriate response.

Response	
<input type="checkbox"/>	Yes, the PII is retrieved by a personal identifier (i.e., individual's name, address, SSN, etc.)
<input type="checkbox"/>	List the identifiers that will be used to retrieve the information on the individual.
<input checked="" type="checkbox"/>	<p>No, the PII is not retrieved by a personal identifier.</p> <p>If no, explain how the data is retrieved from the project.</p> <p>Data can be retrieved from EFSS by viewing or downloading shared files. Data cannot be retrieved from shared files by an individual's name or a personal identifier. The EFSS system administrator can retrieve an event history of a user account by a username.</p>

**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 type="checkbox"/>	<p>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> )</p> <p>Provide the SORN name, number, (List all SORNs that apply):</p>
<input type="checkbox"/>	SORN is in progress
<input type="checkbox"/>	SORN needs to be created
<input type="checkbox"/>	Unaware of an existing SORN
<input checked="" type="checkbox"/>	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*

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*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"/>	<b>Privacy Act Statement</b> The files that are uploaded to EFSS for sharing may include electronic documents that provide a Privacy Act Statement. A Privacy Act Statement is provided on individual electronic documents (e.g., forms) if necessary.
<input type="checkbox"/>	<b>Not Applicable</b>
<input type="checkbox"/>	<b>Unknown</b>

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

N/A. All information that is temporarily stored in EFSS is collected outside of EFSS.

## 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.

**If the project/system:**

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- 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](mailto: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"/>	<a href="#">NUREG-0910, “NRC Comprehensive Records Disposition Schedule</a>
<input checked="" type="checkbox"/>	<a href="#">NARA’s General Records Schedules</a>
<input type="checkbox"/>	Unscheduled

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

<b>System Name (include sub-systems, platforms, or other locations where the same data resides)</b>	EFSS
<b>Records Retention Schedule Number(s)</b>	<a href="#">GRS 5.2 item 010 – Transitory and Intermediary</a>  <a href="#">GRS 3.2 item 030</a> – System Access Records will cover Event Histories and Audit Reports.
<b>Approved Disposition Instructions</b>	<a href="#">GRS 5.2 item 010 – Transitory and Intermediary</a> Temporary. Destroy when no longer needed for business use, or according to agency predetermined time period or business rule.  <a href="#">GRS 3.2 item 030</a> Temporary. Destroy when business use ceases. Collaboration Invitations can be covered by this GRS as well.  EFSS has a default retention of 120 days; all records are deleted from EFSS after that period. The system is <u>not</u> permitted to be used for long-term storage of official agency records. EFSS is primarily intended for temporary file sharing and users are <u>not</u> permitted to use the system for long-term storage of agency documentary material.

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	<p>All documents uploaded to EFSS by NRC staff must be retrieved from the Agencywide Document Access &amp; Management System (ADAMS) or another NRC record repository system.</p> <p>Users can request exceptions for the default retention; however, the official record must be maintained in a record retention system.</p> <p>Any user with co-owner rights can delete a record stored in EFSS. Any files stored in EFSS are deleted after the default retention period, unless an approved exception is made by the ARO and executed by the EFSS SYS ADMIN.</p> <p>If an exception for the default retention has been made, the file owner must delete the information upon completion of the collaboration project or once the document is no longer needed.</p> <p>Records will only pertain to the NRC business mission.</p> <p>All records are automatically deleted after the default retention period and any files uploaded with the same name will replace the existing files. Files and folders are only retained for the period of collaboration which can involve editing data on a daily, weekly, or monthly basis.</p>
<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>	<p>Automated function</p>
<p><b>Disposition of Temporary Records</b></p> <p>Will the records/data or a composite be automatically or manually deleted once they reach their approved retention?</p>	<p>N/A</p>
<p><b>Disposition of Permanent Records</b></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>N/A</p>

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<a href="#">NRC Transfer Guidance (Information and Records Management Guideline - IRMG)</a>	
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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 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, the project will be collecting information from 10 or more persons who are not Federal employees.

### 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?

N/A.

*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

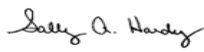
**Project/System Name:** Enterprise File Synchronization and Sharing (EFSS)

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

### Privacy Officer Review

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

**Comments:**

Reviewer's Name	Title
 Signed by Hardy, Sally on 01/09/24	Privacy Officer


## 9 OMB Clearance Determination

### NRC Clearance Officer Review

Review Results	
<input checked="" type="checkbox"/>	No OMB clearance is needed.
<input type="checkbox"/>	OMB clearance is needed.
<input type="checkbox"/>	Currently has OMB Clearance. Clearance No. _____

**Comments:**

EFSS itself does not need an OMB clearance since it is only a vehicle that is used to distribute and collect files. The EFSS users and EFSS Office administrators are responsible for ensuring that any use of EFSS is compliant with the requirements of the Paperwork Reduction Act.


Reviewer's Name	Title
 Signed by Cullison, David on 01/04/24	Agency Clearance Officer

## 10 Records Retention and Disposal Schedule Determination

### Records Information Management Review

Review Results	
<input type="checkbox"/>	No record schedule required.
<input checked="" 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 01/09/24	Sr. Program Analyst, Electronic Records Manager

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## 11 Branch Chief Review and Concurrence

Review Results	
<input checked="" type="checkbox"/>	This project/system <b>does not</b> collect, maintain, or disseminate information in identifiable form.
<input type="checkbox"/>	This project/system <b>does</b> collect, maintain, or disseminate information in identifiable form.

I concur with the Privacy Act, Information Collections, and Records Management reviews.



Signed by Feibus, Jonathan  
on 01/09/24

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

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## ADDITIONAL ACTION ITEMS/CONCERNS

<b>Name of Project/System:</b> Enterprise File Synchronization and Sharing (EFSS)	
<b>Date CISD received PIA for review:</b> December 13, 2023	<b>Date CISD completed PIA review:</b> January 9, 2024
<b>Action Items/Concerns:</b>          	
<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 Chief Information Security Officer (CISO)</i> <i>Office of the Chief Information Officer</i></p>	