U.S. Nuclear Regulatory Commission



Privacy Impact Assessment Space and Property Management System (SPMS) – Parking Management Office of Administration (ADM)

Version 1.0 9/27/2023

| Space and Property Management System (SPMS) – | Version 1.0 |
|---|-------------|
| Parking Management | |
| Privacy Impact Assessment | 9/27/2023 |

Document Revision History

| Date | Version | PIA Name/Description | Author |
|-----------|---------|-------------------------------------|---------------------------|
| 9/27/2023 | 1.0 | SPMS Parking PIA - Initial Release. | ADM Oasis Systems, LLC |
| 9/7/2023 | DRAFT | SPMS Parking 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: Space and Property Management System (SPMS) – Parking Management.

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

Date Submitted for review/approval: September 27, 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 NRC Office of Administration (ADM) uses SPMS, which consists of five modules, to manage office space, property asset inventory, visitor access requests, HQ parking assignments for employees, and facility maintenance. The Parking Management module allows ADM / Division of Facilities and Security (DFS) to administer the processing and distribution of monthly employee-only parking passes for parking spaces at NRC HQ. This ensures an equitable assignment of onsite parking spaces and fulfills facility security requirements in accordance with Federal Management Regulations and NRC specific rules, regulations, and policies.

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

| ☐ PowerApps | ☐ Public Website |
|--------------|------------------|
| ☐ Dashboard | |
| ☐ SharePoint | ☐ None |
| ☐ Other: | |

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 | |

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| below. Annual update and migration to new PIA template for the Parking Management module of SPMS. |
|---|
| Other (explain) |

1.3 Points of Contact:

| | Project Manager | System Owner/Data Owner/Steward | ISSO | Business Project Manager | Technical Project Manager | Executive Sponsor |
|--------------------------------|--------------------|---------------------------------------|-------------------|--------------------------------|---------------------------------|-------------------|
| Name | Cara Drury | Jennifer Golder | Zia Anderson | N/A | Carol Greenwood | N/A |
| Office /Division /Branch | ADM/ DRMA | ADM | ADM/ DRMA/BITT | N/A | ADM/DFS/ FLB/FMT | N/A |
| Telephone | 301-287- 9440 | 301-287-0741 | 301-415- 3483 | N/A | 301-415- 1980 | 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 |
|---|--|---|
| | Statute | Americans with Disabilities Act of 1990, and Collective Bargaining Agreement 39. |
| | Executive Order | |
| | Federal Regulation | 10 Code of Federal Regulatory (CFR) Title 41, Subtitle C Chapter 102 - Subchapter C – Part 102-74 Subpart C, Code of Conduct – Federal Facilities Owned and Leased by the General Service Administration. |
| | Memorandum of Understanding/ Agreement | |
| | Other (summarize and 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).

SPMS supports the NRC's policy to manage a parking program that supports the need for accessible parking at Federal facilities. The Parking Management module is used to determine the utilization of parking spaces, fees collected, prioritization of applicants, and documenting parking violations. Please note that parking permit payments are not collected nor processed by SPMS, only noted in the system regarding payment mechanism and status.

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

N/A.

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 | | Resume or curriculum vitae |
| | Date of Birth | | Driver's License Number |
| | Country of Birth | \boxtimes | License Plate Number |
| | Citizenship | | Passport Number |
| | Nationality | | Relatives Information |
| | Race | | Taxpayer Identification Number |
| | Home Address | | Credit/Debit Card Number |
| | Social Security Number (Truncated or Partial) | | Medical/health information |
| | Gender | | Alien Registration Number |
| | Ethnicity | | Professional/personal references |
| | Spouse Information | | Criminal History |

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| Categories of Information | | | |
|---------------------------|------------------------------|-------------|---|
| | Personal e-mail address | | Biometric identifiers (e.g., facial images, fingerprints, iris scans) |
| | Personal Bank Account Number | | Emergency contact (e.g., a third party to contact in case of an emergency) |
| | Personal Mobile Number | \boxtimes | Accommodation/disabilities information |
| | Marital Status | | Other: Office telephone number/email |
| | Children Information | | address, car make/model/color, and a checkbox indicating need for handicap- |
| | Mother's Maiden Name | | assigned space. |

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).

SPMS stores the following information only for active employees and contractors: employee/contractor name (first, middle, and last), suffix, NRC Local Area Network (LAN) ID, position title, employee status, organization, office telephone number, duty station, mailstop, email address, employee effective date, and employee type. NRC requires office telephone numbers and vehicle tag numbers in case the owner of the vehicle needs to be contacted.

All parking applicants are required to complete and submit to the Parking Resource email address the NRC Form 505, "Application for Parking," or the NRC Form 505A, "Application for Handicap Parking," as applicable. Information is then manually entered into the Parking Management module of SPMS by ADM/DFS.

For employee/contractor parking requests, applicants are required to fill out the NRC Form 505, "Application for Parking," which includes: name, NRC LAN ID, date started at NRC, date started parking at NRC, office mail stop, office telephone number, office work hours, office commuting schedule, vehicle tag number, vehicle make/model/color, type of vehicle parking space required, and rideshare/carpool information. Please note, although rideshare/carpool information (passenger names, office work hours, office mail stop, office telephone number, work address, home address, home telephone number, vehicle tag number, and vehicle make/model/color) is collected on the NRC Form 505, only carpooling member names are entered into SPMS.

For handicapped employee/contractor parking requests, applicants are required to fill out the NRC Form 505A, "Application for Handicap Parking," which includes name, NRC LAN ID, date started at NRC, office mail stop, office telephone number, office work hours, office commuting schedule, vehicle tag number, vehicle make/model/color, and medical certification information for disabled parking. Please note, although medical certification information ("permanent" or "temporary" disability type, temporary disability general diagnosis and duration, and temporary disability diagnosing physician name/address/telephone number) is collected on the NRC Form 505A, this information is not entered into SPMS. Applicants can provide a copy of their state-issued handicapped placard registration card instead of completing the medical certification information. If applicants do not have a registration card or choose not to provide it, the Parking Management team emails the completed NRC Form 505A to the NRC Health Center for assessment. After which, a disabled space is reserved for the employee.

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Users of the Parking Management module of SPMS only have the ability to view daily visitor parking space information; visitor parking-related information must be edited in the VARS module. Visitor parking requests and management are documented in the separate SPMS VARS PIA.

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

All parking applicants are required to complete and submit NRC Form 505, "Application for Parking," or the NRC Form 505A, "Application for Handicap Parking," as applicable. Information is manually entered into the Parking Management module by ADM/DFS.

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.

Throughout the year, the Parking Management team emails employees/contractors with parking permits at the NRC asking them to review and certify their vehicle information to ensure that it is current.

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 an individual's vehicle information (i.e., new vehicle make/model/color, tag numbers, etc.), office commuting schedule, or disability information changes, individuals must submit new NRC Form 505 or 505A, as applicable. Individuals can also update their information during the periodic review and re-certification.

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).

Individuals from ADM/DFS with assigned parking-management duties.

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.

On a weekly basis the Office of the Chief Human Capital Officer (OCHCO) extracts files from the Department of the Interior's (DOI) Federal Personnel Payroll System (FPPS) containing NRC employee and organizational information. FPPS is not integrated into SPMS, but its files are loaded into SPMS. These files contain employee name, email address, telephone number, employee effective date, and employee type, as well as organization codes, office divisions, and branch codes. OCHCO verifies the employee data and the organization data following Federal and NRC regulations and requirements prior to providing the files to SPMS for use by its

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modules.

Additionally, on a nightly basis, SPMS also uploads a file provided by Office of the Chief Information Officer (OCIO) containing the NRC LAN ID and email address of users classified as NRC employees and contractors. OCIO verifies all NRC LAN accounts and email addresses following Federal and NRC requirements.

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 | |
| | | |
| \boxtimes | None | |

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

SPMS resides behind the NRC network firewall, users must first gain access to the NRC network using valid authentication credentials. SPMS user accounts are integrated with the Information Technology Infrastructure (ITI) Identity, Credential, and Access Management (ICAM) for Single Sign-On (SSO) access.

An individual's SPMS access is further restricted by user role within the specific module. For the Parking Management module, NRC parking administrators are provided permissions specific to their assigned roles. Additionally, NRC employees/contractors are notified via an annual request to review, update, and re-certify their parking permit record (i.e., to update vehicle information, office commuting schedule, disability status, etc.). User account actions are logged by the system, as applicable.

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).

SPMS transmits content to staff over the NRC network; data transfers are encrypted.

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

SPMS Parking Management data is stored at the NRC.

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

SPMS is accessible via the NRC network from any NRC site. The level of access for each module is managed through role-based access privileges.

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

Yes, all NRC contractors accessing SPMS Parking Management are NRC badged personnel.

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

SPMS user access is captured in audit logs, which include the date and time of the transaction. For each module, audit logs capture the date and time a data entry is processed in SPMS.

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.

SPMS is included as a subsystem of the Moderate ADM Support System (MASS) FISMA boundary. Parking Management is a module of the SPMS subsystem.

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) Confidentiality – Moderate Integrity – Moderate Availability – Low | |

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.

EA Number: H0043.

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5 Privacy Act Determination

5.1 Is the data collected retrieved by a personal identifier?

Mark the appropriate response.

| Response | | |
|-------------|---|--|
| \boxtimes | Yes, the PII is retrieved by a personal identifier (i.e., individual's name, | |
| | address, SSN, etc.) | |
| \boxtimes | List the identifiers that will be used to retrieve the information on the | |
| <u> </u> | individual. | |
| | Parking personnel use license plate numbers to pull employee/contractor | |
| | information from the system in case the owner of the vehicle needs to be | |
| | contacted. | |
| | For managing carpool registrations, parking personnel can search by NRC | |
| | LAN ID and/or name to add employees and contractors to a carpool. | |
| | In the event employees/contractors report lost parking permits or have made | |
| | a payment, parking personnel can search by name and/or permit number to | |
| | retrieve the applicable parking permit record. | |
| | 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 | | |
|-------------|--|--|--|
| \boxtimes | 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-1 – "Parking Permit Records" | | |
| | 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. | | |

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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 |
|-------------|--|
| \boxtimes | Privacy Act Statement: NRC Form 505 ("Application for Parking") and NRC Form 505A ("Application for Handicap Parking"). |
| | Not Applicable |
| | Unknown |

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

License plate and vehicle make/model/color information is required in order for individuals to apply for parking at the NRC. Disability-related information within the medical certification section of NRC Form 505A is optional if an individual has already provided a copy of their state-issued handicapped placard registration card.

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?

| | NUREG-0910, "NRC Comprehensive Records Disposition Schedule" |
|-------------|--|
| \boxtimes | NARA's General Records Schedules |
| | 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) | SPMS Parking Management |
|---|---|
| Records Retention Schedule Number(s) | GRS 5.6 Item 130 – "Temporary and local facility identification and card access records." |
| Approved Disposition Instructions | GRS 5.6 Item 130: Temporary. Destroy upon immediate collection once the temporary credential or card is returned for potential reissuance due to near expiration or not to exceed 6 months from time of issuance or when individual no longer requires access, whichever is sooner, but longer retention is authorized if required for business use |
| 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. | SPMS Parking Management employs a manual process for supporting RIM requirements. |
| Disposition of Temporary Records Will the records/data or a composite be automatically or manually deleted once they reach their approved retention? Disposition of Permanent Records Will the records be exported to an approved | Once an individual's employment with the NRC is terminated and their parking permit is returned to ADM/DFS, the individual's parking record is manually deleted from the system. N/A. |

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| 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) |

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?

No.

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: Space and Property Management System (SPMS) - Parking

Management

Submitting Office: Office of Administration (ADM)

Privacy Officer Review

| | Review Results | Action Items |
|-------------|---|--|
| | This project/system does not contain PII. | No further action is necessary for Privacy. |
| | 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. |
| \boxtimes | This project/system does contain PII; the Privacy Act does apply. | SORN is required- Information is retrieved by a personal identifier. |

Comments:

Covered by System of Records Notice - NRC-1 - Parking Permit Records.

| Reviewer's Name | Title |
|------------------------------------|-----------------|
| Signed by Hardy, Sally on 01/25/24 | Privacy Officer |

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9 OMB Clearance Determination

NRC Clearance Officer Review

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

Comments:

NRC Form 505a needs OMB approval since it collects information from non-Federal medical practitioners.

| Reviewer's Name | Title |
|--|--------------------------|
| Guages Signed by Cullison, David on 01/25/24 | Agency Clearance Officer |

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10 Records Retention and Disposal Schedule Determination Records Information Management Review

| Review Results | |
|----------------|--|
| | No record schedule required. |
| | 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 01/19/24 | Sr. Program Analyst, Electronic Records Manager |

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11 Branch Chief Review and Concurrence

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

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Signed by Feibus, Jonathan on 01/25/24

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: Space and Property Management System (SPMS) – Parking Management | | |
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| | | |
| Date CSB received PIA for review: | Date CSB completed PIA review: | |
| January 10, 2024 | January 25, 2024 | |
| Action Items/Concerns: | | |
| | | |
| | | |
| | | |
| | | |
| Copies of this PIA will be provided to: | | |
| Caroline Carusone | | |
| Director IT Services Development and Operations Division Office of the Chief Information Officer | | |
| Garo Nalabandian Deputy Chief Information Security Officer (CISO) Office of the Chief Information Officer | | |