
U.S. Nuclear Regulatory Commission



**Privacy Impact Assessment
Government Retirement and Benefits (GRB) Platform**

**Office of the Chief Human Capital Officer (OCHCO)
Office of the Chief Information Officer (OCIO)**

**Version 1.0
12/20/2023**

Government Retirement and Benefits (GRB) Platform	Version 1.0
Privacy Impact Assessment	12/20/2023

Document Revision History

Date	Version	PIA Name/Description	Author
12/20/2023	1.0	Government Retirement and Benefits (GRB) - FINAL Release	OCIO / OCHCO Oasis Systems, LLC
12/01/2023	DRAFT	Government Retirement and Benefits (GRB) - DRAFT Release	OCIO / OCHCO Oasis Systems, LLC

Government Retirement and Benefits (GRB) Platform	Version 1.0
Privacy Impact Assessment	12/20/2023

Table of Contents

1	Description	1
2	Authorities and Other Requirements	3
3	Characterization of the Information	4
4	Data Security	5
5	Privacy Act Determination	8
6	Records and Information Management-Retention and Disposal	9
7	Paperwork Reduction Act	11
8	Privacy Act Determination	13
9	OMB Clearance Determination	14
10	Records Retention and Disposal Schedule Determination	15
11	Branch Chief Review and Concurrence	16

Government Retirement and Benefits (GRB) Platform	Version 1.0
Privacy Impact Assessment	12/20/2023

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: Government Retirement and Benefits (GRB) Platform.

Data Storage Location (i.e., Database Server, SharePoint, Cloud, Other Government Agency, Power Platform) GRB is hosted by Government Retirement and Benefits, Inc., in a Government Community Cloud.

Date Submitted for review/approval: January 11, 2024.

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.

GRB Platform is a cloud-based Software-as-a-Service (SaaS) Federal retirement and benefits solution provided to the Nuclear Regulatory Commission (NRC) by Government Retirement and Benefits, Inc. The GRB Platform is authorized by the Federal Risk and Authorization Management Program (FedRAMP).

The NRC benefit specialists use GRB to prepare service histories and create retirement estimate reports as well as other related estimate reports. NRC employees use GRB to review their own compensation and benefits information and to submit employee benefits requests.

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	

Government Retirement and Benefits (GRB) Platform	Version 1.0
Privacy Impact Assessment	12/20/2023

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)

1.3 Points of Contact:

	Project Manager	System Owner/Data Owner/Steward	ISSM	Business Project Manager	Technical Project Manager	Executive Sponsor
Name	Sandra Labissiere	Richard Revzan	Natalya Bobryakova	John Shea	John Shea	Richard Revzan
Office /Division /Branch	Office of the Chief Human Capital Officer (OCHCO) / Associate Director for Human Resources Operations and Policy (ADHROP) / Workforce Management & Benefits Branch (WMBB)	Office of the Chief Human Capital Officer (OCHCO) / Associate Director for Human Resources Operations and Policy (ADHROP)	Office of the Chief Information Officer (OCIO) / Cyber and Infrastructure Security Division (CISD)	Office of the Chief Human Capital Officer (OCHCO) / Human Capital Analysis Branch (HCAB)	Office of the Chief Human Capital Officer (OCHCO) / Human Capital Analysis Branch (HCAB)	Office of the Chief Human Capital Officer (OCHCO) / Associate Director for Human Resources Operations and Policy (ADHROP)
Telephone	301-287-0551	N/A	301-287-0671	301-287-0545	301-415-0246	301-287-0671

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	5 United States Code (U.S.C.) Chapters 83 and 84
<input checked="" type="checkbox"/>	Executive Order	Social Security numbers are collected and used in accordance with Executive Order 9397, as amended by Executive Order 13478.
<input type="checkbox"/>	Federal Regulation	
<input type="checkbox"/>	Memorandum of Understanding/Agreement	
<input type="checkbox"/>	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 collected is used for calculation of Federal employee's retirement benefit estimates, disability and death benefit estimates, Service Computation Date calculation, Military/Civilian deposit and redeposit requirements, and retirement plan determination.

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

GRB uses Social Security numbers to identify employees and populate employees' GRB profiles in order to maintain service information and to compute estimates of retirement benefits.

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 type="checkbox"/>	Contractors
<input checked="" type="checkbox"/>	Members of the Public (any individual other than a federal employee, consultant, or contractor)
<input type="checkbox"/>	Licensees
<input type="checkbox"/>	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			
<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 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 checked="" type="checkbox"/>	Gender	<input type="checkbox"/>	Alien Registration Number
<input type="checkbox"/>	Ethnicity	<input type="checkbox"/>	Professional/personal references
<input checked="" type="checkbox"/>	Spouse Information	<input type="checkbox"/>	Criminal History
<input checked="" type="checkbox"/>	Personal email address	<input type="checkbox"/>	Biometric identifiers (facial images, fingerprints, iris scans)
<input checked="" type="checkbox"/>	Personal Bank Account Number	<input type="checkbox"/>	Emergency contact e.g., a third party to contact in case of an emergency
<input checked="" type="checkbox"/>	Personal Mobile Number	<input type="checkbox"/>	Accommodation/disabilities information
<input checked="" type="checkbox"/>	Marital Status	<input checked="" type="checkbox"/>	Other: Information about spouses, dependents, and designated beneficiaries of a Federal employee, if applicable: name, SSN, date of birth, banking information for direct deposit. Information collected in the Application for Death Benefits include applicant's name, SSN, date of birth, banking information for direct deposit; spouse's (including former spouses) name; dependent child's name, SSN, and date of birth.
<input checked="" type="checkbox"/>	Children Information		
<input type="checkbox"/>	Mother's Maiden Name		

Government Retirement and Benefits (GRB) Platform	Version 1.0
Privacy Impact Assessment	12/20/2023

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).

GRB is populated with information entered directly by employees and via electronic file transfer from FPPS. In the event of a death in service, the benefit specialist collects information from the survivors and then manually enters the information in GRB to retrieve the applicable death benefit calculation and forms.

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

- Office of Personnel Management (OPM) Standard Form 3104, Application for Death Benefits, https://www.opm.gov/forms/pdf_fill/sf3104b.pdf.

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

The information is provided by the individual. In the event of a death in service, the benefit specialists collect information from the survivors.

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

Employees and benefit specialists verify the information for accuracy and completeness.

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?

Individuals cannot update information within GRB. The information used to populate GRB is from employee's official personnel records. The employee should notify the benefit specialists if there are any discrepancies.

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 OCHCO staff and/or Contractor access and administer all employee data.

All NRC employees may access the system to review their own data.

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.

Government Retirement and Benefits (GRB) Platform	Version 1.0
Privacy Impact Assessment	12/20/2023

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 type="checkbox"/>	None

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

GRB employs role-based access controls and permits access according to user's role. Authorized users can access GRB by utilizing a Single Sign-on authentication service provided by the agency's Identity, Credential, and Access Management (ICAM) Authentication Gateway. ICAM ensures that individuals who access NRC computer systems and services have been appropriately vetted for access.

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).

GRB allows only secure web connections via the Hypertext Transfer Protocol Secure (HTTPS) that uses encryption for secure communication over the Internet.

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

GRB is hosted by Government Retirement and Benefits, Inc., a Cloud Service Provider (CSP), in a FedRAMP authorized cloud environment.

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?

The NRC OCHCO contractors can access the data in GRB to provide authorized services to OCHCO. NRC contractors do possess NRC badges. The CSP staff can access the data in a cloud environment to support system's operations. The CSP staff undergo the Public Trust

Government Retirement and Benefits (GRB) Platform	Version 1.0
Privacy Impact Assessment	12/20/2023

background investigations conducted by the U.S. Internal Revenue Service (IRS). The CSP staff do not possess NRC badges.

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

The OCHCO administrators review auditable events, audit logs, and audit reporting records for indications of inappropriate or unusual activity on a weekly basis and report any suspicious activity to the NRC Computer Security and Incident Response Team (CSIRT).

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.

GRB is a component of the Third Party System (TPS) OCHCO External Services Subsystem (OES).

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.

GRB is a component of TPS-OES. The TPS EA Number is 20120006.

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. The information on the individual is retrieved by the employee's name
<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): Government-wide SORN - OPM-GOVT-1, General Personnel 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.

Government Retirement and Benefits (GRB) Platform	Version 1.0
Privacy Impact Assessment	12/20/2023

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 The required OPM forms contain Privacy Act Statements. Privacy Act Statements are provided on all retirement and benefit standard forms.
<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?

Yes, providing PII is mandatory. PII is needed to create an employee’s GRB profile in order to maintain service information and to compute an estimate of retirement benefits. The retirement benefit estimates cannot be calculated without access to employees’ PII.

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

Government Retirement and Benefits (GRB) Platform	Version 1.0
Privacy Impact Assessment	12/20/2023

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:

- 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)	Government Retirement and Benefits (GRB) Platform
Records Retention Schedule Number(s)	<p>GRS 2.5, item 020: Individual employee separation files. It includes records not included in separating employee's Electronic Official Personnel Folder (eOPF), documenting individual employees' transfer to another Federal agency of office or voluntary or involuntary separation from career, disability, early retirement, death, political appointment service, and legal and financial obligations of government.</p> <p>GRS 2.5, item 051: Phased retirement individual case files.</p> <p>Case files of individual employee participation in phased retirement.</p>
Approved Disposition Instructions	GRS 2.5 item 020 : Temporary. Destroy 1 year after date of separation or transfer, but longer retention is authorized if required for business use.

Government Retirement and Benefits (GRB) Platform	Version 1.0
Privacy Impact Assessment	12/20/2023

	GRS 2.5 item 051 : Temporary: Destroy 1 year after employee participation concludes or the employee retires, but longer retention is authorized if required for business use. (These records could be retained with the retirement file and should be retained as the GRS 2.5 item 020 as above).
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?	The records/data is deleted manually.
Disposition of Permanent Records 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)	N/A

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?

N/A.

7.2 Is there any collection of information addressed to all or a substantial majority of an

Government Retirement and Benefits (GRB) Platform	Version 1.0
Privacy Impact Assessment	12/20/2023

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>.

Government Retirement and Benefits (GRB) Platform	Version 1.0
Privacy Impact Assessment	12/20/2023

8 Privacy Act Determination

Project/System Name: Government Retirement and Benefits (GRB) Platform

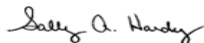
Submitting Office: Office of the Chief Human Capital Officer (OCHCO)

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 Government-wide SORN - OPM-GOVT-1, General Personnel Records

Reviewer's Name	Title
 Signed by Hardy, Sally on 01/31/24	Privacy Officer


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. 3206-0172

Comments:

The listed control number is for OPM's SF-3104 and SF-3104b.

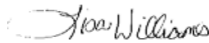
Reviewer's Name	Title
 Signed by Cullison, David on 01/31/24	Agency Clearance Officer

10 Records Retention and Disposal Schedule Determination

Records Information Management Review

Review Results	
<input type="checkbox"/>	No record schedule required.
<input 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 Williams, Lisa on 01/31/24	Sr. Program Analyst, Electronic Records Manager

Government Retirement and Benefits (GRB) Platform	Version 1.0
Privacy Impact Assessment	12/20/2023

11 Branch Chief Review and Concurrence

Review Results	
<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.

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



Signed by Feibus, Jonathan
on 01/31/24

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

Government Retirement and Benefits (GRB) Platform	Version 1.0
Privacy Impact Assessment	12/20/2023

ADDITIONAL ACTION ITEMS/CONCERNS

Name of Project/System: Government Retirement and Benefits (GRB) Platform	
Date CSB received PIA for review: January 11, 2024	Date CSB completed PIA review: January 31, 2024
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 Chief Information Security Officer (CISO)</i> <i>Office of the Chief Information Officer</i></p>	