
U.S. Nuclear Regulatory Commission



Privacy Impact Assessment Labor, Employment, and Contract Law (LECL) Case Management System Office of the General Counsel

**Version 1.0
02/09/2024**

Instruction Notes:

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

Template Version 2.0 (08/2023)

LECL Case Management System	Version 1.0
Privacy Impact Assessment	02/09/2024

Document Revision History

Date	Version	PIA Name/Description	Author
02/09/2024	1.0	LECL Case Management System Initial Release	Brian Harris

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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: Labor, Employment, and Contract Law (LECL) Case Management System.

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

Date Submitted for review/approval: January 29, 2024.

Note: When completing this PIA do not include any information that would raise security concerns or prevent this document from being made publicly available.

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 Labor, Employment, and Contract Law (LECL) Case Management System on SharePoint is used by the Nuclear Regulatory Commission (NRC) Office of the General Counsel (OGC) to manage labor, employment, personnel security, and contract legal matters relating to the operation and administration of the agency. The SharePoint site allows electronic organizing of legal cases; the site can associate cases with relevant case notes, contact information, documents, reminders, tasks, milestones, and other data in a secure environment.

The LECL Case Management System supports labor, employment, personnel security, and contract litigation matters for the NRC, and supports the NRC’s Human Capital Strategy 4 (Promote a strong NRC internal safety culture with an open, collaborative work environment) and Human Capital Strategy 6 (Strengthen workforce diversity and inclusion).

The underlying infrastructure for SharePoint falls within the Information Technology Infrastructure (ITI) Azure Cloud Services (ACS) FISMA Boundary. ITI does not own, nor is it responsible for the management of this site including access controls or data stored within it. This SharePoint site is fully owned and managed by the OGC staff.

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 checked="" type="checkbox"/> SharePoint	<input 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 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>
<input type="checkbox"/>	Other (explain)

1.3 Points of Contact: (Do not adjust or change table fields. Annotate N/A if unknown. If multiple individuals need to be added in a certain field, please add lines where necessary.)

	Project Manager	System Owner/Data Owner/Steward	ISSO	Business Project Manager	Technical Project Manager	Executive Sponsor
Name	Yana Shnayder		Julie Hughes	N/A	Brian Harris Rebecca Susko	Brian Harris
Office /Division /Branch	OGC/LHE /PSB		OCIO/GEMSD /CSB/IAT	N/A	OGC/LRAA /LECL	OGC/LRAA /LECL
Telephone	301-287- 0706		301-287-9277	N/A	301-287-9120 301-415-0032	301-287- 9120

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	42 U.S.C. 2201(d), as amended, 5 U.S.C. 3132(a); 5 U.S.C. 4303, as amended; 5 U.S.C. 7503; 29 U.S.C. 633a; 29 U.S.C. 791; 42 U.S.C. 2000e-16; 42 U.S.C. 2165; 15 U.S.C. 631, 644; 31 U.S.C. 3511; 44 U.S.C. 3301.
<input type="checkbox"/>	Executive Order	
<input checked="" type="checkbox"/>	Federal Regulation	13 CFR 124.501-520; 48 CFR subpart 4.8; 48 CFR part 19.
<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).

To process and track labor, employment, personnel security, and contract matters related to claims filed against the NRC.

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

The project does not specifically collect Social Security numbers; however, Social Security numbers may be collected incidentally as part of the litigation process. In particular, Social Security numbers may be included on documents or materials collected and used during the litigation process.

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3 Characterization of the Information

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

Category of individual	
<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: Former Federal employees, applicants for Federal employment

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 checked="" type="checkbox"/>	Resume or curriculum vitae
<input checked="" type="checkbox"/>	Date of Birth	<input checked="" type="checkbox"/>	Driver's License Number
<input checked="" type="checkbox"/>	Country of Birth	<input checked="" type="checkbox"/>	License Plate Number
<input checked="" type="checkbox"/>	Citizenship	<input checked="" type="checkbox"/>	Passport number
<input checked="" type="checkbox"/>	Nationality	<input checked="" type="checkbox"/>	Relatives Information
<input checked="" type="checkbox"/>	Race	<input checked="" 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 checked="" type="checkbox"/>	Medical/health information
<input checked="" type="checkbox"/>	Gender	<input checked="" type="checkbox"/>	Alien Registration Number
<input checked="" type="checkbox"/>	Ethnicity	<input checked="" type="checkbox"/>	Professional/personal references
<input checked="" type="checkbox"/>	Spouse Information	<input checked="" type="checkbox"/>	Criminal History
<input checked="" type="checkbox"/>	Personal e-mail 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 checked="" type="checkbox"/>	Personal Mobile Number	<input checked="" type="checkbox"/>	Accommodation/disabilities information
<input checked="" type="checkbox"/>	Marital Status	<input checked="" type="checkbox"/>	Other: Equal Employment Opportunity (EEO) complaints; disciplinary actions; performance-related actions; security clearance actions.
<input type="checkbox"/>	Children Information		
<input type="checkbox"/>	Mother's Maiden Name		

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

The information may be collected directly from the employee, contractor, former employee, or applicant for employment, through the litigation process.

Information may also be collected from the Equal Employment Opportunity Commission (EEOC), Merit Systems Protection Board (MSPB), Federal Labor Relations Authority (FLRA), General Services Administration (GSA), Government Accountability Office (GAO), Small Business Association (SBA), hearing adjudicators, arbitrators, witnesses, or outside attorneys during the litigation process.

Finally, information may be collected from existing NRC files/databases including Chief Human Capital Officer (OCHCO) personnel records; union grievances; eOPF files, personnel security files, Small Business and Civil Rights (SBCR) case files, contract materials from STAQs, Office of the Inspector General (OIG) reports of investigation.

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.

Information may be collected directly from the individual or from a third party.

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

The project does not check for accuracy as the individual would, in most circumstances, be able to address or contest the information's validity during the course of litigation.

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

No.

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

The individual would, in most circumstances, be able to address or contest the information's validity during the course of litigation.

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).

The Case Management System SharePoint site will have limited access/permissions. Access is granted to only those staff in the Office of the General Counsel (OGC) who have authorization

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and a need to know. This includes OGC/LECL attorneys; the Deputy General Counsel for Legislation, Rulemaking and Agency Administration; authorized staff from OGC PSB and authorized administrative assistants within OGC. In addition, one NRC badged contractor has access to the SharePoint site to assist with future maintenance of the site.

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

N/A.

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

N/A.

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

Agreement Type	
<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.

NRC Cleared users authenticate via ICAM to the O365 environment (PIV login) and specific access to the SharePoint site is managed through SharePoint permissions set by the SharePoint owners. SharePoint owners are responsible for quarterly review of the permissions.

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).

Information will primarily be in documents (e.g., .pdf, .doc, .msg, or .jpeg files) transferred via email (which is encrypted), downloaded from platforms supported by other administrative bodies, or that are in existing NRC records on the NRC IT systems.

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

NRC SharePoint Site.

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

No, the site is only accessed via the NRC production network.

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

Yes, an NRC badged contractor has access to the SharePoint site and may be involved in future maintenance of the site.

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

Updates, edits, and additional documents added to the site are tracked and date and time stamped with the username. In addition, site access is limited to those with a business need to access the system. Access permissions will be reviewed periodically.

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

No.

4.11 Define which FISMA boundary this project is part of.

Information Technology Infrastructure (ITI) Azure Cloud Services (ACS) 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 Chief Information Security Officer (CISO) Confidentiality-Moderate Integrity-Moderate Availability-Moderate

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

The LECL Case Management System SharePoint site falls within Information Technology Infrastructure ACS boundary. The ITI EA number is 20090005.

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. Individual's name, case number, or document number.
<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-8: Employee Disciplinary Actions, Appeals, Grievances, and Complaints Records. "Duplicate system—A duplicate system may be maintained, in whole or in part, in the Office of the General Counsel." NRC-41: Tort Claims and Personal Property Claims Records EEOC/GOVT-1: Equal Employment Opportunity in the Federal Government Complaint and Appeal Records OPM/GOVT-1: General Personal Records OPM/GOVT-2: Employee Performance File System Records OPM/GOVT-5 (Recruiting, Examining, and Placement 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 type="checkbox"/>	Privacy Act Statement
<input checked="" 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?

It depends on the circumstances of the case. Not providing information may negatively impact the individual's case.

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 checked="" type="checkbox"/>	NUREG-0910, “NRC Comprehensive Records Disposition Schedule
<input 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)	LECL Case Management System
Records Retention Schedule Number(s)	SEE TABLE BELOW FOR RECORDS RETENTION SCHEDULE NUMBERS AND APPROVED DISPOSITION INSTRUCTIONS
Approved Disposition Instructions	SEE TABLE BELOW FOR RECORDS RETENTION SCHEDULE NUMBERS AND APPROVED DISPOSITION INSTRUCTIONS
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.	No.
Disposition of Temporary Records Will the records/data or a composite be automatically or manually deleted once they reach their approved retention?	Manually deleted.
Disposition of Permanent Records Will the records be exported to an approved format and transferred to the National Archives based on approved	N/A

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retention and disposition instructions? If so, what formats will be used? NRC Transfer Guidance (Information and Records Management Guideline - IRMG)	
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SCHEDULE NUMBER	SCHEDULE TITLE	DISPOSITION INSTRUCTION
GRS 1.1 ITEM 010	Financial transaction records related to procuring goods and services, paying bills, collecting debts, and accounting. Official record held in the office of record.	Temporary. Destroy 6 years after final payment or cancellation, but longer retention is authorized if required for business use.
GRS 1.1 ITEM 011	Financial transaction records related to procuring goods and services, paying bills, collecting debts, and accounting. All other copies.	Temporary. Destroy when business use ceases.
GRS 1.1 ITEM 060	Contract appeals case file	Temporary. Destroy 1 year after final resolution, but longer retention is authorized if required for business use.
GRS 1.1 ITEM 080	Administrative claims by or against the United States	Temporary. Destroy 7 years after final action, but longer retention is authorized if required for business use.
GRS 2.1 ITEM 050	Job vacancy case files. Records of one-time competitive and Senior Executive Service announcements/selections.	Temporary. Destroy 2 years after selection certificate is closed or final settlement of any associated litigation; whichever is later.
GRS 2.1 ITEM 090	Interview records	Temporary. Destroy 2 years after case is closed by hire or non-selection, expiration of right to appeal a non-selection, or final settlement of any associated litigation, whichever is later.

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<u>GRS 2.3 ITEM 060</u>	<p>Administrative grievance, disciplinary, performance-based, and adverse action case files</p> <p>Note 1: Letter of reprimand filed in an employee's Official Personnel File is scheduled by GRS 2.2, item 041.</p> <p>Note 2: Per OPM, each agency must select one fixed retention period, between 4 and 7 years, for all administrative grievance, adverse action, and performance-based action case files. Agencies may not use different retention periods for individual cases.</p>	<p>Temporary. Destroy no sooner than 4 years but no later than 7 years (see note 2) after case is closed or final settlement on appeal, as appropriate.</p>
<u>GRS 2.3 ITEM 070</u>	Alternative Dispute Resolution (ADP) case files. Informal process.	<p>Temporary. Destroy 3 years after case is closed, but longer disposition is authorized if required for business use.</p>
<u>GRS 2.3 ITEM 071</u>	Alternative Dispute Resolution (ADR) case files. Formal process.	<p>Temporary. Destroy 7 years after case is closed, but longer retention is authorized if required for business use.</p>
<u>GRS 2.3 ITEM 080</u>	Merit Systems Protection Board (MSPB) case files.	<p>Temporary. Destroy 3 years after final resolution of case, but longer retention is authorized if required for business use.</p>
<u>GRS 2.3 ITEM 090</u>	Labor arbitration (negotiated grievance procedure) case records.	<p>Temporary. Destroy 3 years after close of case, but longer retention is authorized if required for business use.</p>
<u>GRS 2.3 ITEM 100</u>	Federal Labor Relations Authority (FLRA) case files	<p>Temporary. Destroy 3 years after final resolution of case, but longer retention is authorized if required for business use.</p>

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<u>GRS 2.3 ITEM 110</u>	EEO discrimination complaint case files. Informal process	Temporary. Destroy 3 years after resolution of case, but longer retention is authorized if required for business use.
<u>GRS 2.3 ITEM 111</u>	EEO discrimination complaint case files. Formal process	Temporary. Destroy 7 years after resolution of case, but longer retention is authorized if required for business use.

Note: Information in *Section 6, Records and Information Management-Retention and Disposal*, does not need to be fully resolved for final approval of the privacy impact assessment.

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>.

STOP HERE - The remaining pages will be completed by the Privacy Officer, Records Management, and Information Collections Team.

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8 Privacy Act Determination

Project/System Name: Labor, Employment, and Contract Law (LECL) Case Management System

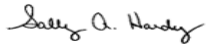
Submitting Office: Office of the General Counsel

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:

NRC-8: Employee Disciplinary Actions, Appeals, Grievances, and Complaints Records; NRC-41: Tort Claims and Personal Property Claims Records; EEOC/GOVT-1: Equal Employment Opportunity in the Federal Government Complaint and Appeal Records; OPM/GOVT-1: General Personal Records; OPM/GOVT-2: Employee Performance File System Records; and OPM/GOVT-5 (Recruiting, Examining, and Placement Records)

Reviewer's Name	Title
 Signed by Hardy, Sally on 02/28/24	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:

No clearance is needed as the information collected appears to meet the conditions of 5 CFR 1320.4(a)(2) for an exclusion from the requirements in 5 CFR 1320.3. An OMB clearance might be needed if information is being collected outside of the conduct of a civil action to which the United States or any official or agency thereof is a party, or during the conduct of an administrative action, investigation, or audit involving an agency against specific individuals or entities.

Reviewer's Name	Title
 Signed by Cullison, David on 02/23/24	Agency Clearance Officer


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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 02/23/24	Sr. Program Analyst, Electronic Records Manager

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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 02/28/24

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: Labor, Employment, and Contract Law (LECL) Case Management System	
Date CSB received PIA for review: February 9, 2024	Date CSB completed PIA review: February 27, 2024
Action Items/Concerns: 	
<p><i>Copies of this PIA will be provided to:</i></p> <p><i>Gwendolyn Hayden Acting Director IT Services Development and Operations Division Office of the Chief Information Officer</i></p> <p><i>Jonathan Feibus Chief Information Security Officer Chief Information Security Division Office of the Chief Information Officer</i></p>	