

U.S. Nuclear Regulatory Commission

Privacy Impact Assessment

Instructions: **Section A, B, C, and D must be completed for all systems. Section E must be completed if yes is the answer to Section B, questions 1 and 2.**

Date: 03/30/2005

A. GENERAL SYSTEM/APPLICATION INFORMATION

(See definitions at end of document)

1. Person completing this form:

Name	Title	Phone No.	Office
Swiger, Roger	Sr. Information Management Analyst	415-0073	OIS

2. System owner:

Name	Title	Phone No.	Office
Goldberg, Francine	Director, IRSD, OIS	415-7545	OIS

3. What is the name of this system?

Agencywide Documents Access And Management System (ADAMS)

4. Briefly describe the purpose of this system. What agency function does it support?

ADAMS is a client-server architecture that has replaced two legacy systems. It was designed as a combination of policies, processes, and hardware and software tools to manage most NRC official records in an electronic rather than paper-based environment. ADAMS is an enterprise system that provides cradle-to-grave document management. The system supports document creation or capture, distribution and dissemination, records management, and search and retrieval by both NRC staff and the public.

5. Does this Privacy Impact Assessment support a proposed new system or a proposed modification to an existing system.

_____ New System x Modify Existing System

B. PRIVACY ACT APPLICABILITY

1. Does this system collect, maintain, or disseminate personal information in identifiable form (e.g., name, social security number, date of birth, home address, etc.) about individuals ?

Yes _____ No x

2. If yes, will the data be retrieved by an individual's name or other personal identifier (e.g., social security number, badge number, etc.)?

Yes _____ No x

If you answer yes to questions 1 and 2, complete Section E.

C. INFORMATION COLLECTION APPLICABILITY

1. Will the personal data be collected from or maintained by persons who are not Federal employees?

Yes _____ No x

2. Will the data be collected from Federal contractors?

Yes _____ No x

3. If the answer is yes to either question 1 or 2, will the data be collected from 10 or more persons during a calendar year?

Yes _____ No x

4. If the answer is yes to question 3, is the information to be collected covered by an existing OMB clearance number? If yes, indicate the clearance number, 3150-____

D. RECORDS RETENTION AND DISPOSAL SCHEDULE APPLICABILITY

Does this system already have a NARA-approved records disposition schedule? (Reference NUREG-0910, "NRC Comprehensive Records Disposition Schedule," or contact your office Records Liaison Officer or John Harris, OIS.)

Yes x No _____

If yes, list the records schedule number. The NARA approved records retention and disposition requirements for ADAMS records are contained throughout NUREG-0910. Each NRC records series for which ADAMS is designated to maintain the Official

Agency Record has an authorized disposition that addresses the following four components:

- (1) Paper records used as the source to create ADAMS Tagged Image File Format (TIFF) or Portable Document Format (PDF) files;
- (2) Copies of electronic files stored outside of ADAMS used to create ADAMS Portable Document Format (PDF) files, TIFF files, and ASCII files that remain with staff members and OCIO processing staff after creation of the ADAMS records:
- (3) ADAMS PDF files and TIFF files:
- (4) ADAMS document profiles and ADAMS document packages created for the management, search, and retrieval of the PDF files and TIFF files, and ADAMS data related to digital signatures, and data that evidence final NRC management and staff concurrences in documents that are linked to and considered part of the official records.

Complete Section E only if the answers to Section B, questions 1 and 2 are Yes.

E. SYSTEM DATA INFORMATION

1. *Type* of information maintained in the system
 - a. Describe the information to be maintained in the system (e.g., financial, medical, training, personnel.) Give a detailed description of the data.
2. *Source* of the data in this system
 - a. Are data being collected from the subject individual? If yes, what types of data are being collected?
 - b. Are data on this individual being collected from other NRC files and databases for this system? If yes, identify the files and databases.
 - c. Are data on this individual being collected from a source or sources other than the subject individual and NRC records? If yes, what is the source and what type of data is being collected?
 - d. How will data collected from sources other than the subject individual or NRC records be verified as current, accurate, and complete?
3. *Attributes* of the data
 - a. Are the *data elements* described in detail and documented? If yes, what is the name of the document? Where is it located?
 - b. Is the use of the data both relevant and necessary for the purpose for which the system is designed?

- c. Will the system derive (i.e., create) new data or create previously unavailable data about an individual through aggregation from the information collected?
 - (1) How will aggregated data be maintained, filed, and utilized?
 - (2) How will aggregated data be validated for relevance and accuracy?
- 4. If data are consolidated, what *controls* protect it from unauthorized access, use, or modification?
- 5. How will the data be *retrieved* from the system?
 - a. Can it be retrieved by personal identifier? ___ Yes ___ No.
If yes, explain.
 - b. Is a password or data description required? ___ Yes ___ No.
If yes, explain.
- 6. Describe the report or reports that can be produced from this system.
 - a. What reports are produced from the system?
 - b. What are the reports used for?
 - c. Who has access to these reports?
- 7. *Records retention*
 - a. What are the record types contained in this system and the medium on which they reside? (Examples: type - program records, medium - electronic; type - database, medium - electronic; type - system documentation, medium - paper.)
 - b. What is the NARA-authorized retention period for each records series in this system?
 - c. If unscheduled, what are your retention requirements for each records series in this system?
 - d. What are the procedures for disposing of the data at the end of the retention period (specifically address paper copy, magnetic, or other forms of media)?
 - e. How long will produced reports be maintained?
 - f. Where are the reports stored?
 - g. Where are the procedures for maintaining the data/reports documented?
 - h. How will unused or unwanted reports be disposed of?
- 8. Capability to *monitor individuals*

- a. Will this system provide the capability to identify, locate, and monitor (e.g., track, surveillance) individuals? ___ Yes ___ No. If yes, explain.
 - b. What controls will be used to prevent unauthorized monitoring?
9. Coverage Under Existing *Privacy Act System of Records*
- a. Under which Privacy Act System of Records (SOR) notice does this system operate (link to list of SOR available on NRC Internal Home Page)? Provide number and name.
 - b. If the Privacy Act System of Records is being modified, will the SOR notice require amendment or revision? ___ Yes ___ No.
If yes, explain.
10. Access to the Data
- a. Who will have access to the data in the system (users, managers, system administrators, developers, other)?
 - b. Are criteria, procedures, controls, and responsibilities regarding access documented? If so, where?
 - c. Will users have access to all data in the system or will users' access be restricted? Explain.
 - d. What controls are or will be in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access?
 - e. Do other systems share data or have access to data in this system?
___ Yes ___ No. If yes, explain.
 - f. Will other agencies share data or have access to data in this system (Federal, State, local, other)? ___ Yes ___ No. If yes, explain.
 - g. Were Privacy Act clauses cited (or will be cited) and were other regulatory measures addressed in contracts with contractors having access to this system? ___ Yes ___ No. If yes, explain.

DEFINITIONS

Personal Information is information about an identifiable individual that may include but not be limited to:

- race, national or ethnic origin, religion, age, marital or family status
- education, medical, psychiatric, psychological, criminal, financial, or employment history
- any identification number, symbol, or other particular assigned to an individual
- name, address, telephone number, fingerprints, blood type, or DNA

Aggregation of data is the taking of various data elements and then turning them into a composite of all the data to form another type of data such as tables or data arrays, or collecting data into a single database.

Consolidation means combining data from more than one source into one system, application, or process. Existing controls for the individual parts should remain or be strengthened to ensure no inappropriate access by unauthorized individuals. However, since individual pieces of data lose their identity, existing controls may actually be diminished; e.g., a summary census report may not point at the individual respondent but rather at a class of respondents, which makes it less personal.

PRIVACY IMPACT ASSESSMENT REVIEW/APPROVAL

(For Use by OIS Staff)

System Name: Agencywide Documents Access and Management System (ADAMS)

Submitting Office: Office of Information Services

A. PRIVACY ACT APPLICABILITY REVIEW

Privacy Act is not applicable.

Privacy Act is applicable. Currently covered under System of Records, NRC-____. No modification to the system notice is required.

Privacy Act is applicable. Creates a new system of records. FOIA/PA Team will take the lead to prepare the system notice.

Privacy Act is applicable. Currently covered under System of Records, NRC-____. Modification to the system notice is required. FOIA/PA Team will take the lead to prepare the following changes:

Comments:

In July 2003, a request for a legal opinion was submitted to OGC to re-address the issue of whether or not ADAMS should be considered a Privacy Act system of records. September 15, 2003, OGC reconfirmed that ADAMS does not constitute a system of records for purposes of the Privacy Act. The basic concept of ADAMS has not been modified.

Reviewer's Name	Title	Date
Sandra S. Northern	Privacy Program Officer	5/10/2005

B. INFORMATION COLLECTION APPLICABILITY DETERMINATION

No OMB clearance is needed.

OMB clearance is needed.

Currently has OMB Clearance.

Comments:

Reviewer's Name	Title	Date
Christopher J. Colburn	Information Collections Team Leader	05/19/05

C. RECORDS RETENTION AND DISPOSAL SCHEDULE DETERMINATION

___ Additional information is needed to complete assessment.

X Needs to be scheduled.

___ Existing records retention and disposition schedule covers the system - no modifications needed.

___ Records retention and disposition schedule must be modified to reflect the following:

Comments:

Our office concurs with your assessment that the ADAMS system records are currently scheduled with the exception for the software and coding required to operate ADAMS. We believe that FileNet, CustomCode, and ForeMost software and coding requires scheduling and subsequently we have drafted a records disposition schedule for your review.

Reviewer's Name	Title	Date
Joda D. Holt	Records Management Analyst	05/18/05

D. BRANCH CHIEF REVIEW AND CONCURRENCE

X Does not constitute a Privacy Impact Assessment required by the E-Government Act of 2002

___ Does constitute a Privacy Impact Assessment required by the E-Government Act of 2002 and requires approval of the Director, IRSD.

CONCUR IN REVIEW: R/A Date: 05/25/2005

Brenda J. Shelton, Chief, Records and FOIA/Privacy Services Branch

E. DIVISION DIRECTOR APPROVAL OF PRIVACY IMPACT ASSESSMENT:

(Approval is only required when Yes is given to Section B, questions 1 and 2 and Section C, question 1. The system collects, maintains, or disseminates personal information in identifiable form about members of the public.)

Francine F. Goldberg, Director, Information and Records Services Division

Date: ___ / ___ / ___

**TRANSMITTAL OF PRIVACY IMPACT ASSESSMENT/
PRIVACY IMPACT REVIEW RESULTS**

TO: Office of Information Services (OIS)	Office Sponsor: Roger Swiger	
George Matthews, Acting Director Business Process Improvement and Applications Division, OIS	Name of System: Agencywide Documents Access And Management System (ADAMS)	
Charlotte Turner Director Program Management, Policy Development, and Analysis Staff, OIS	Date Received: 05/05/2005	Date Completed: 05/25/2005
<p>Noted Application Development and System Security Issues:</p> <p>None.</p>		
Brenda J. Shelton, Chief Records and FOIA/Privacy Services Branch, OIS	Signature: <i>/RA/</i>	Date: 05/25/05