

## U.S. Nuclear Regulatory Commission

### Privacy Impact Assessment

*(Designed to collect the information necessary to make relevant determinations regarding the applicability of the Privacy Act, the Paperwork Reduction Act information collections requirements, and record management requirements.)*

for the

### Human Resources Management System (HRMS) Time and Labor (T&L) Modernization Project

Date prepared by sponsoring office: July 2009

#### A. GENERAL SYSTEM INFORMATION

1. Provide brief description of the system:

HRMS T&L Modernization supports the collection of employee personnel records for the purpose of recording labor cost hours; employee time, attendance, and labor hour records; historical employee pay, compensation records, and historical employee training records. The system will have the capability to process/approve requests for leave used, overtime earned, and comp-time earned/used.

2. What agency function does it support?

HRMS T&L Modernization supports recording of employee activity based hours to be used primarily for payroll and fee billing.

3. Describe any modules or subsystems, where relevant, and their functions.

Time and Labor (from 11/2001 to date) - maintains employee activity based hourly reporting.

Historical HRMS Human Resources (01/1975 to 11/2003) has the full range of personnel data from when the NRC was processing HR-related transactions directly in HRMS.

Historical HRMS Payroll (11/2001 to 11/2003). The Payroll Historical Database contains payroll transactions from 01/1975 to 11/2001. Historical payroll data will continue to be accessible by only OCFO payroll staff for reporting purposes.

HRMS Training (1/1975 to 4/2008) maintains employee training and development records.

4. Points of Contact:

Project Manager	Office/Division/Branch	Telephone
John Bird	OCFO/DOC	301.415.6602
Business Project Manager	Office/Division/Branch	Telephone
Gordon Peterson	OCFO/DOC/FM	301.415.7348
Technical Project Manager	Office/Division/Branch	Telephone
Dereje B. Tessema	OIS/BPIAD/BPPMB.PMT2	301.415.5713
Executive Sponsor	Office/Division/Branch	Telephone
Cynthia Rheume	OCFO/DOC	301.415.7379

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

a.  New System  Modify Existing System  Other (Explain)

b. If modifying an existing system, has a PIA been prepared before?

Yes

(1) If yes, provide the date approved and ADAMS accession number.

Date Approved – May 1, 2007  
 Accession number - ML071080376

**B. INFORMATION COLLECTED AND MAINTAINED**

*(These questions are intended to define the scope of the information requested as well as the reasons for its collection. Section 1 should be completed only if information is being collected about individuals. Section 2 should be completed for information being collected that is not about individuals.)*

1. **INFORMATION ABOUT INDIVIDUALS**

a. Does this system collect information about individuals?

Yes

(1) If yes, what group(s) of individuals (e.g., Federal employees, Federal contractors, licensees, general public) is the information about?

Federal employees

- b. What information is being maintained in the system about individuals (describe in detail)?

The information/data maintained in the system includes general employee personnel records, salary and benefit records, leave balances, payroll data, time and attendance data, activity based work hours and historical training data.

- c. Is the information being collected from the subject individuals?

Yes

- (1) If yes, what information is being collected from the individuals?

Time and attendance data is entered directly by the employee.

- d. Will the information be collected from 10 or more individuals who are **not** Federal employees?

No

- (1) If yes, does the information collection have OMB approval? No

(a) If yes, indicate the OMB approval number.

- e. Is the information being collected from internal files, databases, or systems?

No.

- (1) If yes, identify the files/databases/systems and the information being collected.

- f. Is the information being collected from an external source(s)?

Yes

- (1) If yes, what is the source(s) and what type of information is being collected?

The source is an ASCII text file from the Department of Interior, National Business Center's (DOI/NBC) Federal Payroll and Personnel System (FPPS). The type of information is employee demographics, salary and benefits, leave balances and payroll.

- g. How will this information be verified as current, accurate, and complete?

Data is verified through OCFO manual reconciliations and against FPPS data.

- h. How will the information be collected (e.g. form, data transfer)?

The information is collected via ASCII text files and database transfers.

- i. What legal authority authorizes the collection of this information?

26 CFR 31.6011(b)(2), 31.6109-1; 110 Stat 2105; 5 U.S.C. 6334; 5 U.S.C. Part III, Subpart D, Ch. 55; 31 U.S.C. 716, 1104, 1105, 1108, 3325, 3511, 3512, 3701, 3711, 3717, 3718

- j. What is the purpose for collecting this information?

The purpose is to create paychecks for employees, FEES invoicing, Salary and Benefits modeling, Cost Accounting modeling, General Ledger posting and travel voucher payments.

## 2. **INFORMATION NOT ABOUT INDIVIDUALS**

- a. What type of information will be maintained in this system (describe in detail)?

Activity codes and office designations.

- b. What is the source of this information? Will it come from internal agency sources and/or external sources? Explain in detail.

Employee activity codes are collected from the Reactor Program System (RPS) database for staff whose hours are fee billable (NRR, NRO, FSME, etc), otherwise employee activity codes are loaded by office Program Management, Policy Development, and Analysis (PMDA) staff. Office designations come from FPPS.

- c. What is the purpose for collecting this information?

To pre-populate employee profiles to aide in efficiency and accuracy of time entry.

## **C. USES OF SYSTEM AND INFORMATION**

*(These questions will identify the use of the information and the accuracy of the data being used.)*

1. Describe all uses made of the information.

Uses of the data are as follows: data transmissions to DOI/NBC for paycheck and leave balances calculations, license fees billings, update the core financial

system (currently Federal Financial System (FFS)), financial reporting, project management, salary and benefits modeling, cost accounting modeling and strategic workforce planning.

2. Is the use of the information both relevant and necessary for the purpose for which the system is designed?

Yes

3. Who will ensure the proper use of the information?

Office of the Chief Financial Officer (OCFO) system administrators.

4. Are the data elements described in detail and documented?

Yes

- a. If yes, what is the name of the document that contains this information and where is it located?

PeopleBooks which was delivered with the Oracle PeopleSoft product and is located on-line on the HRMS servers.

5. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?

Yes

- a. If yes, how will aggregated data be maintained, filed, and utilized?

The aggregated data will be maintained in the HRMS T&L system. A small subset of this data is also in the agency Financial and RPS systems and DOI's FPPS system. Information is maintained electronically by personnel specialists or payroll operations staff. Hard copy documentation is kept in the employee's and time and attendance folders. Aggregate information is used to manage labor cost data for the purposes of employee wage and compensation.

- b. How will aggregated data be validated for relevance and accuracy?

To assure data integrity and internal controls, data discrepancy reports have been created. Human resources and payroll offices investigate any discrepancies that they discover or are brought to their attention by employees. Agency policies on information integrity, security, and roles and responsibilities are documented in a series of Management Directives relating to personnel and financial information.

- c. If data are consolidated, what *controls* protect it from unauthorized access, use, or modification?

Data access is restricted in the HRMS system based on role and need to know. Internal agency policies and procedures define controls and protections based on OMB requirements and NIST guidelines. Controls are audited and tested routinely to assure adequate protections from unauthorized access, use or modification. The system utilizes user ID and password protections and relies on parameter defenses to protect the systems and records.

6. How will the information be *retrieved* from the system (be specific)?

Data is retrieved by a system generated employee identification number.

7. Will this system provide the capability to identify, locate, and monitor (e.g., track, observe) individuals?

No

- a. If yes, explain.

(1) What controls will be used to prevent unauthorized monitoring?

8. Describe the report(s) that will be produced from this system.

Employee level historical personnel actions, organization/position, salary/awards and compensation, leave/time and attendance, retirement and budgetary and labor cost information, license fee, and cost reimbursements.

- a. What are the reports used for?

The reports are used for human resources management; workforce planning; payroll processing and reporting; labor cost reporting; and, financial accounting purposes.

- b. Who has access to these reports?

Staff from the OCFO, Office of Human Resources (HR), Office of Information Services (OIS), and office designated Time and Labor coordinators based on relevance to the functions each office performs.

**D. RECORDS RETENTION AND DISPOSAL**

*(This section is intended to establish whether the information, data, or records contained in this system has an approved records retention schedule. (Reference NUREG-0910, NRC Comprehensive Records Disposition Schedule.)*

1. Has a retention schedule (either under the General Records Schedule or NRC-specific) for this system been approved by the National Archives and Records

Administration?

Yes

a. If yes, list the schedule number and approved disposition.

GRS 1-1.b-OPF	GRS 1-29.b	GRS 2-13.a	GRS 2-18
GRS 1-10	GRS 2-1.a	GRS 2-13.b	GRS 2-22.c
GRS 1-23.a(4)	GRS 2-1.b GRS 2-2	GRS 2-14.a	GRS 2-22.a
GRS 1-23.a(3)(a)	GRS 2-7	GRS 2-15.a	GRS 2-23.a
GRS 1-23.b(3)	GRS 2-8	GRS 2-15.b	GRS 20-3.a
GRS 1-23.b(2)(a)	GRS 2-9.b		

## E. ACCESS TO DATA

### 1. INTERNAL ACCESS

a. What organizations (offices) will have access to the information in the system?

All NRC employees will have access which will be based on roles and responsibilities.

(1) For what purpose?

Time entry, approval, reporting, maintenance and operations.

(2) Will access be limited?

Yes, access will be limited based on roles and responsibilities with need to know to perform official duties.

b. Will other systems share or have access to information in the system?

Yes, Cost Accounting System, RPS, Fee Billing System.

c. How will information be transmitted or disclosed?

Information is transmitted through system interface.

d. What controls will prevent the misuse (e.g., unauthorized browsing) of information by those having access?

Access will be monitored and limited by roles and responsibilities. Audit trails track user access by User ID with date and time stamps and will be periodically reviewed by the assigned ISSO designees.

- e. Are criteria, procedures, controls, and responsibilities regarding access documented?

Yes.

- (1) If yes, where?

Electronically online on an NRC network server. Documentation is also available (electronically) in Management Directives, in HRMS online help, and on the OCFO web page.

## 2. **EXTERNAL ACCESS**

- a. Will external agencies/organizations/public share or have access to the information in this system?

There will be no direct external access to the information in the system; however data files will be transmitted between DOI/NBC FPPS and NRC over a dedicated line.

- b. What information will be shared/disclosed and for what purpose?

Employee name, address, social security number, banking information, salary and time worked. Information is used for employee reporting, payroll, and system maintainability.

- c. How will this information be transmitted/disclosed?

The information is transmitted through file downloads over a dedicated line.

## **F. TECHNICAL ACCESS AND SECURITY**

- 1. Describe security controls used to limit access to the system (e.g., passwords).  
Explain

Controls used to limit access to the system are a unique user id and password. Attempts to access the system are limited to three failed attempts before being locked out. Password expires after 90 days.

- 2. Will the system be accessed or operated at more than one location (site)?

Yes

- a. If yes, how will consistent use be maintained at all sites?

All sites access the same database located at headquarters.



2. Which user group(s) (e.g., system administrators, project manager, etc.) has access to the system?

There are several user groups that have access to the system. All employees for time entry are in an Employee group. Timekeepers are in a Timekeeper group. T&L Coordinators are in the Coordinator group. HR and T&L have their own groups. System administrators are in an all inclusive access group.

4. Will a record of their access to the system be captured?

Yes

- a. If yes, what will be collected?

User id and time and date stamp.

5. Will contractors have access to the system?

Yes

- a. If yes, for what purpose?

Timekeeping, system maintenance, operations and development.

- Ensure that the following Federal Acquisition Regulation (FAR) clauses are referenced in all contracts/agreements/purchase order where a contractor has access to a Privacy Act system of records to ensure that the wording of the agency contracts/agreements/purchase order make the provisions of the Privacy Act binding on the contractor and his or her employees:

- 52.224-1 Privacy Act Notification.
- 52.224-2 Privacy Act.

6. What auditing measures and technical safeguards are in place to prevent misuse of data?

All access to the HRMS system is captured in system log files and audit records.

7. Are the data secured in accordance with FISMA requirements?

The data will be secured in accordance with FISMA requirements

- a. If yes, when was Certification and Accreditation last completed?

The current HRMS T&L is currently operating under Authority to Operate (ATO) that was granted on July 24, 2008 and will expire July 2011.

**PRIVACY IMPACT ASSESSMENT REVIEW/APPROVAL**  
*(For Use by OIS/IRSD/RFPSB Staff)*

**System Name:** Human Resources Management System (HRMS) T&L Modernization Project

**Submitting Office:** Office of the Chief Financial Officer (OCFO)

**A. PRIVACY ACT APPLICABILITY REVIEW**

Privacy Act is not applicable.

Privacy Act is applicable.

**Comments:**

The information/records will be maintained as part of NRC's Privacy Act System of Records, NRC-11, General Personnel Records; NRC-19, Official Personnel Training Records; and, NRC-21, Payroll Accounting Records. This system contains personally identifiable information. No modification to the system notice is required.

Name of Reviewer	Title	Date
Sandra S. Northern	Privacy Act Program Analyst	August 13, 2009

**B. INFORMATION COLLECTION APPLICABILITY DETERMINATION**

No OMB clearance is needed.

OMB clearance is needed.

Currently has OMB Clearance. Clearance No.

**Comments:**

The Human Resources Management System (HRMS) T&L Modernization Project does not collect information from non-Federal employees. Federal contractors (e.g., systems administrators or programmers supporting the system) submit identifying information and passwords to access the system. No OMB clearance is needed for this system.

Name of Reviewer	Title	Date
Tremaine Donnell	Acting Team Leader, Information Collections Team	August 13, 2009

**C. RECORDS RETENTION AND DISPOSAL SCHEDULE DETERMINATION**

- No record schedule required.
- Additional information is needed to complete assessment.
- Needs to be scheduled.
- Existing records retention and disposition schedules covers the system; however, modifications are needed.
- Records retention and disposition schedule must be modified to reflect the following:

**Comments:**

As indicated in **Section D, Records Retention and Disposal**, elsewhere in this document: the records in this system are covered by the General Records Schedules (GRS) issued by the Archivist of the United States to provide disposition authority for temporary administrative records common to several or all agencies of the Federal Government. While the GRS formally was applicable to only paper-based records, it is now applicable to electronic records also. Thus, records covered by this system are already approved by the GRS. For example, GRS 1, Civilian Personnel Records, Item 1b, covers the records of separated employees and requires that these files be sent to the National Personnel Records Center (NPRC), 30 days after the latest separation, after which time the records are transferred to the NPRC where they are retained 65 years after separation from Federal service.

Additionally, the system includes coverage for records scheduled under GRS 1, Item 29b, Employee Training, which requires that these records be destroyed when they are 5 years old, when superseded or obsolete, whichever is later. Also, GRS 2, Time and Attendance, Item 7, Time and Attendance Source Records, requires that these records be destroyed after GAO audit or when 6 years old, whichever is sooner. Other GRS Items are identified and retentions vary based on the series covered.

The disparate, but mandatory GRS records retentions, coupled with the proliferation of new technologies requires the application of new strategies and methodologies for records management. RASS proposes revising the schedule for records in this system and developing flexible retentions for records schedules using *big buckets*. This revision will enable the NRC to manage these records more efficiently and effectively. As they currently exist, staff members maintain and use the records longer than their current dispositions allow during the performance of routine business that includes documenting payroll, training and related activities. For this reason, RASS plans to work with Agency staff to develop flexible retention schedules using big buckets. Our anticipated revision of the schedule does not preclude the certification of the system.

Name of Reviewer	Title	Date
Mary Haynes	Records Management Analyst	August 7, 2009

**D. BRANCH CHIEF REVIEW AND CONCURRENCE**

  X   This IT system **does not** collect, maintain, or disseminate information in identifiable form from or about members of the public.

       This IT system **does** collect, maintain, or disseminate information in identifiable form from or about members of the public.

I concur in the Privacy Act, Information Collections, and Records Management reviews:

      /RA/        
Russell A. Nichols, Chief  
Records and FOIA/Privacy Services Branch  
Information and Records Services Division  
Office of Information Services

Date: 08/14/2009

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

<b>TO:</b> Cynthia Rheaume, Controller, Office of the Chief Financial Officer	
<b>Name of System:</b> Human Resources Management System (HRMS) Time and Labor (T&L) Modernization Project	
<b>Date RFPSB received PIA for review:</b> August 3, 2009	<b>Date RFPSB completed PIA review:</b> August 14, 2009
<p><b>Noted Issues:</b></p> <p>This system contains personally identifiable information.</p> <p>This system will operate as part of NRC's Privacy Act System of Records - NRC-11, General Personnel Records; NRC-19, Official Personnel Training Records; and NRC-21, Payroll Accounting Records.</p> <p>No information collection issues.</p> <p>Existing records retention and disposition schedules covers the system; however, RASS plans to work with Agency staff to develop flexible retention schedules using big buckets.</p>	
Russell A. Nichols, Chief Records and FOIA/Privacy Services Branch Office of Information Services	Signature/Date: <i>/RA/ 08/14/2009</i>
<p><i>Copies of this PIA will be provided to:</i></p> <p><i>James Shields, Acting Director Business Process Improvement and Applications Division Office of Information Services</i></p> <p><i>Paul Ricketts Senior IT Security Officer (SITSO) FISMA Compliance and Oversight Team Computer Security Office</i></p>	