

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.)

Revised

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

DATE: April 2011

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
Susan Daniel	OIS/BPIAD/BPPMB	301.415.6151
Business Project Manager	Office/Division/Branch	Telephone
Mary Matheson	OCFO/DOC	301.415.8748
Technical Project Manager	Office/Division/Branch	Telephone
David Witmer	Contract Staff under Susan Daniel	301.415.6151
Executive Sponsor	Office/Division/Branch	Telephone
Reggie Mitchell	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 – August 14, 2009
Accession number - ML092150026

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 and data maintained in the system is general employee personnel records, salaries and benefits, 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?

The data being collected from individuals includes, name, address, social security number, databank account, time and attendance and budget execution data.

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?

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

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

Yes

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

Employee activity based profiles are collected from the Reactor Program System (RPS) database.

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

Yes

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

The source is an ASCII text file from the Department of Interior's (DOI) 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 the Office of the Chief Financial Officer (OCFO) reconciliations, Standard Form 52s, and Earnings and Leave statements.

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 Code of Federal Regulations 31.6011(b)(2), 31.6109-1; 5 United States Code (U.S.C.) 6334; 5 U.S.C. Part III, Subpart D; 31 U.S.C. 716; 31 U.S.C. Chapters 35 and 37.

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 against which employees charged their time, 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.

The source of this information is the RPS system and DOI FPPS. The information is transferred via database to database.

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

Purpose is 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 for paycheck and leave balances calculations, license fees billings, update the agency's core financial system, 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?

All NRC employees

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 NRC's financial and RPS systems and DOI's FPPS. 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. Office of Human Resources (HR) and OCFO 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

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.

- a. Who has access to these reports?

Staff from HR, OCFO, 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 question 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		

2. If you answered “No” to question D.1, complete the following section.

- a. Does the information in the system:

Have historical value?	YES	NO
Document NRC business decisions?	YES	NO
Contain data used to make a judgment or conclusion?	YES	NO
Provide statute or required regulatory information?	YES	NO

- b. What is the value of the information to your organization and the Agency?

(1) When will it no longer be needed?

- c. How will information, no longer required for current business operations, be maintained?

(1) Will it be separated from currently active information?

- d. Does this electronic information system replace a previously “paper-based” information file system?

No

(1) If so, which files?

E. ACCESS TO DATA

1. **INTERNAL ACCESS**

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

All NRC Offices have access.

- (1) For what purpose?

For employee time entry, approvals, and reporting of activities.

- (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, the RPS, Financial Accounting and Integrated Management Information System (FAIMIS), and FPPS.

- c. How will information be transmitted or disclosed?

Information is transmitted over a dedicated line. Data files are either transmitted to other agencies or downloaded from their sites to NRC.

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

Access will be monitored. 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?

On an NRC network server. Documentation is also available 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?

Yes

(1) If yes, who.

Department of Interior
Office of Personnel Management

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.

3. 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, to perform timekeeping activities, system maintenance, and operations and development.

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?

Yes, the current system is operating under Authority to Operate that was granted on July 24, 2008.

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

System Name: Revised Human Resources Management System (HRMS) Time and Labor (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:

This system maintains personally identifiable information and will operate as part of NRC's Privacy Act systems of records NRC-11, General Personnel Records; NRC-19, Official Personnel Training Records; and NRC-21, Payroll Accounting Records. No modification to the system notices is required.

Reviewer's Name	Title	Date
Sandra S. Northern	Privacy Act Program Analyst	May 11, 2011

B. INFORMATION COLLECTION APPLICABILITY DETERMINATION

No OMB clearance is needed.

OMB clearance is needed.

Currently has OMB Clearance. Clearance No.

Comments:

The HRMS Time and Labor Modernization Project will not collect information from non-Federal employees. No OMB clearance is needed for this system.

Reviewer's Name	Title	Date
Tremaine Donnell	Information Collections Team Leader	May 10, 2011

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 schedule covers the system - no modifications needed.

Comments:

As indicated in **Section D**, *Records Retention and Disposal*, of this PIA, 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.

Reviewer's Name	Title	Date
Mary Haynes	Records Management Analyst	May 10, 2011

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

TO: Reggie Mitchell, Controller, Office of the Chief Financial Officer	
Name of System: HRMS Time and Labor Modernization	
Date IRSD received PIA for review: April 27, 2011	Date IRSD completed PIA review: May 11, 2011
<p>Noted Issues:</p> <p>This system maintains personally identifiable information.</p> <p>The records in this system are protect by the provisions of the Privacy Act, operating as part of NRC's Privacy Act systems 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>The records retention and disposition schedules identified in Section D of this PIA apply to the records maintained in this system.</p>	
Russell A. Nichols, Chief Information Services Branch Information and Records Services Division Office of Information Services	Signature/Date: /RAN/ 5/11/2011
<p><i>Copies of this PIA will be provided to:</i></p> <p><i>James C. Corbett, 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>	