

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.)

Symplicity HiRE Law Edition

Date prepared by sponsoring office: 5/17/2011

A. GENERAL SYSTEM INFORMATION

1. Provide a detailed description of the system:

Symplicity HiRE Law Edition is a web-based system owned by the Symplicity Corporation. The NRC will contract with the Symplicity Corporation to use its system to track, manage, and interact with employment applicants. This system integrates with over 200 law schools.

2. What agency function does it support?

In order to fulfill its vital mission of protecting people and the environment, the NRC relies on a workforce that possesses detailed knowledge and specialized technical skills. Implementation of Symplicity HiRE will directly support the NRC's organizational excellence objectives of openness, effectiveness, and operational excellence.

Because this system directly integrates with a majority of U.S. law schools, it will serve as a powerful outreach tool and enhance the public's awareness of the NRC and its unique mission. This system will substantially increase effectiveness and operational excellence in that it will allow the Office of the General Counsel (OGC) to use an efficient, innovative strategy to recruit the best and brightest attorneys for its two main recruitment programs: the Honor Law Graduate Program (HLGP) and Summer Intern Program.

Implementation of Symplicity HiRE will also support the NRC's Hiring Reform Action Plan and the President's initiative on Federal Hiring Reform. It will streamline current recruitment procedures and increase the quality and speed of hiring of mission-critical and commonly filled OGC positions. It will allow for more open communication with applicants and increased accountability, in that it will allow applicants to check their application status throughout the recruitment process.

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

Not applicable.

4. What legal authority authorizes the purchase or development of this system?

Section 161(d) of the Atomic Energy Act of 1954; Energy Reorganization Act of 1974.

5. What is the purpose of the system and the data to be collected?

Symlicity HiRE will serve as an automated tool for efficiently recruiting, managing, and communicating with applicants for OGC positions. It will be necessary for applicants to provide their applications, which may contain personally identifiable information, so that their qualifications may be adequately and appropriately assessed.

6. Points of Contact:

Project Manager	Office/Division/Branch	Telephone
Jennifer E. Gilman, Recruitment and Professional Development Coordinator	OGC/Program Support Branch	301-415-3655
Business Project Manager	Office/Division/Branch	Telephone
Jennifer E. Gilman, Recruitment and Professional Development Coordinator	OGC/Program Support Branch	301-415-3655
Technical Project Manager	Office/Division/Branch	Telephone
Jennifer E. Gilman, Recruitment and Professional Development Coordinator	OGC/Program Support Branch	301-415-3655
Executive Sponsor	Office/Division/Branch	Telephone
Stephen G. Burns, General Counsel	OGC	301-415-1743

7. 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?

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

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 maintain information about individuals?

Yes.

- (1) If yes, identify the group(s) of individuals (e.g., Federal employees, Federal contractors, licensees, general public).

General public (individuals that submit their applications for consideration for OGC recruitment programs)

(2) IF NO, SKIP TO QUESTION B.2.

- b. What information is being maintained in the system about an individual (be specific)?

The system will collect and maintain application materials submitted by applicants, including cover letters, resumes, school transcripts, lists of references, and writing samples. These application materials may include names, addresses, phone numbers, email addresses, school information/grades, employment information, and works of writing.

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

Applications will be submitted directly by the individual applicants.

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

Yes.

- (1) If yes, does the information collection have OMB approval?

No, but will be required.

- (a) If yes, indicate the OMB approval number:

- e. Is the information being collected from existing NRC 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 external sources (any source outside of the NRC)?

No.

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

(2) How will information not collected directly from the subject individual be verified as current, accurate, and complete?

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

The information will be collected through the systems application submission process via direct entry and data upload/transfer.

2. **INFORMATION NOT ABOUT INDIVIDUALS**

a. Will information not about individuals be maintained in this system?

Yes.

(1) If yes, identify the type of information (be specific).

Information about the NRC's two OGC recruitment programs, the HLGP and Summer Intern Program, and the related employment opportunities (title, position description, grade/series, salary, qualifications) and will be made maintained in this system.

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

This information will be entered into the system by OGC's Recruitment and Professional Development Coordinator.

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 data in this system.

- Advertise/post positions available through OGC's HLGP and Summer Intern Program.
- Submission of applications.
- Review/assess applicant qualifications.
- Provide status of application review process.

- Generate ad hoc reports for management (periodic updates)
2. Is the use of the data both relevant and necessary for the purpose for which the system is designed?
Yes.
 3. Who will ensure the proper use of the data in this system?
The OGC Recruitment and Professional Development Coordinator will serve as the Project Officer for this system and will take all necessary steps and precautions to ensure proper use of the data collected.
 4. Are the data elements described in detail and documented?
Yes. Documentation maintained by the Symplicity Corporation.
 5. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?
No.
 - a. If yes, how will aggregated data be maintained, filed, and utilized?
 6. How will data be validated for relevance and accuracy, and what *controls* protect it from unauthorized access, use, or modification?
The system has a built-in mechanism for identifying duplicate profiles (for example, it will “flag” applications filed under the same name and allow the designated user to determine if it is in fact a duplicate or fraudulent submission).
The system allows applicants to manually update their own submitted materials and data. The designated user has access to manually update data, if necessary, through a series of steps. The system has a procedure in place that requires the designated user to verify that any manual changes are indeed intended and should overwrite original data.
 7. How will data be **retrieved** from the system? Will data be retrieved by an individual’s name or personal identifier? (Be specific)
Data collected from submitted applications will be arranged into a searchable format. The designated OGC user will sort and search the data using a select number of identifiers (e.g., name, school, grades, and keywords (such as place of employment)).
 8. 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?

9. List the report(s) that will be produced from this system.

The designated OGC user may search data using certain identifiers (as listed above) and produce reports to organize applicant information for qualifications assessment and general recruitment purposes (e.g., number of applicants that applied from a certain law school, number of applicants overall).

a. What are the reports used for?

The reports will be used for applicant qualification assessments and general recruitment needs.

b. Who has access to these reports?

The designated OGC user will have sole access to produce reports. Reports may be shared with certain OGC staff, such as upper management, on an as-needed basis strictly for general recruitment purposes. The designated OGC user will use discretion as to what information in reports is shared and will remove any unnecessary personally identifiable information.

D. ACCESS TO DATA

1. Which NRC offices will have access to the data in the system?

OGC.

(1) For what purpose?

OGC will utilize Symplicity HiRE as an automated tool for recruiting, managing, and communicating with applicants for OGC HLGP and Summer Intern Program positions.

(2) Will access be limited?

Yes, to OGC designated staff.

2. Will other NRC systems share data with or have access to the data in the system?

No.

(1) If yes, identify the system(s).

- (2) How will the data be transmitted or disclosed?
3. Will external agencies/organizations/public have access to the data in the system?
- Yes.
- (1) If yes, who.
- General public
- (2) Will access be limited?
- Yes.
- (3) What data will be accessible and for what purpose/use?
- General public will have view only access to employment opportunities with no login required.
- Applicants will be required to create a profile for login and password. Access limited to view of employment opportunities and submission and update of their specific applications.
- (4) How will the data be transmitted or disclosed?
- General public/applicant can view and submit/update application materials through direct entry and data upload/transfer.

E. RECORDS 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). These determinations are made through records retention schedules and are required under 36 CFR 1234.10. These following questions are intended to determine whether the records in the system have an approved records retention schedule or if one will be needed.)

1. Can you map this system to an applicable retention schedule in NUREG 0910, or the General Records Schedules at <http://www.archives.gov/records-mgmt/grs> ? If yes, please cite the schedule number, approved disposition, and describe how this is accomplished. For example, will the records or a composite thereof be deleted once they reach their approved retention or exported to a file for transfer based on their approved disposition?

Yes. Records will be retained according to the General Records Schedule 1 (Civilian Personnel Records), Item number 33 (Examining and Certification Records). Records are kept for a period of 2 full fiscal years and destroyed/deleted.

Please note that OGC currently refers to the Office of Human Resources (OHR) retention schedule, although the HLGP and Summer Intern Program are operated solely by OGC. The OGC Records Liaison has raised the issue with NRC records staff about creating a separate retention schedule for the OGC recruitment programs modeled after the OHR schedule.

If your response to the above question is no, please answer the questions below:

2. If the records cannot be mapped to an approved records retention schedule, how long do you need the records? Please explain.
3. Would these records be of value to another organization or entity at some point in time? Please explain.
4. How are actions taken on the records? For example, is new data added or updated by replacing older data on a daily, weekly, or monthly basis?
5. What is the event or action that will serve as the trigger for updating, deleting, removing, or replacing information in the system? For example, does the information reside in the system for three years after it is created and then is it deleted?
6. Is any part of the record an output, such as a report, or other data placed in ADAMS or stored in any other location, such as a shared drive or MS SharePoint?
7. Does this system allow for the deletion or removal of records no longer needed and how will that be accomplished?

F. TECHNICAL ACCESS AND SECURITY

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

OGC designates a select number of users that will each have a unique login and password with full access to system data. Most likely, the project manager will be the only NRC/OGC user.

General public will have view only access to employment opportunities with no login required.

Applicants will be required to create a profile with login and password. Access limited to view, submission and update of their specific applications.

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

This system will have role-based access. The system will only collect the information and application materials necessary for applicant qualifications assessments. Access to applications is limited to subject individual and OGC designated user. The designated OGC users will take the necessary precautions to safeguard their logins and passwords. When using the system, designated users will rely on internal codes of conduct to search and retrieve only the information needed to carry out the recruitment process.

3. Are criteria, procedures, controls, and responsibilities regarding access to the system documented?

Yes, and will be made available by the Symplicity Corporation.

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

Yes, this is a web-based system that can be accessed by the public anywhere there is an internet connection. The designated OGC user will access the system only in locations with secure internet access (not public connections, like libraries or restaurants). Also, the designated OGC user will be required to properly login and log out for each session in the system.

5. Which user groups (e.g., system administrators, project manager, etc.) have access to the system?

Symplicity Corporation system administrator(s) and OGC project manager/or designated user.

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

Yes, an event log provides integrated transaction log/audit trail.

7. Will contractors be involved with the design, development, or maintenance of the system?

Yes, as this is a subscription service through the Symplicity Corporation.

If yes, and if this system will maintain information about individuals, ensure Privacy Act and/or PII contract clauses are inserted in their contracts.

- *FAR clause 52.224-1 and FAR clause 52.224-2 should be referenced in all contracts, when the design, development, or operation of a system of records on individuals is required to accomplish an agency function.*
- *PII clause, "Contractor Responsibility for Protecting Personally Identifiable Information" (June 2009), in all contracts, purchase orders, and orders against other agency contracts and interagency agreements that involve*

contractor access to NRC owned or controlled PII.

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

From the perspective of the system provider: Symplicity has a robust set of security standards, as outlined in the associated "Symplicity Corporation Security Standards" document.

From the perspective of the organization: The designated OGC users will take the necessary precautions to safeguard their logins and passwords. When using the system, designated users will rely on internal codes of conduct to search and retrieve only the information needed to carry out the recruitment process.

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

System Name: Symplicity HiRE Law Edition

Submitting Office: Office of the General Counsel

A. PRIVACY ACT APPLICABILITY REVIEW

Privacy Act is not applicable.

Privacy Act is applicable.

Comments:

Symplicity HiRE will collect and maintain personally identifiable information and will meet the criteria for a Privacy Act system of records ("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 identifying number, symbol, or other identifying particular assigned to the individual"). Symplicity HiRE will be covered by NRC's currently published Privacy Act system of records notice NRC-28 Merit Selection Records.

Reviewer's Name	Title	Date
Sandra S. Northern	Privacy Act Program Analyst	June 8, 2011

B. INFORMATION COLLECTION APPLICABILITY DETERMINATION

No OMB clearance is needed.

OMB clearance is needed.

Currently has OMB Clearance. Clearance No. _____

Comments:

The Simplicity HiRE system directly integrates with the majority of U.S. law schools and will enhance public awareness and better recruiting capability for the NRC to recruit the best and brightest applicants. This system is not covered under USAJOBS and will require separate OMB approval. OGC must obtain an OMB clearance for this system prior to using it.

Reviewer's Name	Title	Date
Tremaine Donnell	Team Leader, Information Collections Team	June 6, 2011

C. RECORDS RETENTION AND DISPOSAL SCHEDULE DETERMINATION

No record schedule required.

Needs to be scheduled.

Existing records retention and disposition schedule covers the system.

Comments:

Simplicity Hire is a cloud-based system that includes resumes of law school subscribers and is similar to USAJobs.gov or Monster.com. The OGC would purchase a subscription that would enable access to resumes for the purpose of identifying and selecting the best qualified subscribers for potential Agency employment. Additionally, the office could generate ad hoc reports to allow for the identification, comparison, and selection of the best qualified candidates. General Records Schedule (GRS) 1, Civilian Personnel Records, provides several items that would cover these records, including:

- Item 33g which covers register or inventory of eligibles (OPM Form 5001-C or equivalent, documenting eligibility of an individual for Federal jobs.) Disposition: Destroy 2 years after the date on which the register of inventory is terminated.
- Item 33k which covers cancelled and ineligible applications for positions from an inventory. Disposition: Cut off annually. Destroy 1 year after cutoff.

Additionally, the ad hoc reports that are generated are covered under GRS 20, Downloaded and Copied Data, Item 12a. Disposition: Delete when they are no longer needed for administrative, legal, audit, or other operational purposes.

Implementation of the retention schedules are mandatory under 44 U.S.C. 3303a(d), and although this does not prevent further development of the system, retention functionality or a manual process must be incorporated to meet this requirement.

Reviewer's Name	Title	Date
Mary Haynes	Records Management Analyst	June 2, 2011

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

To: Stephen G. Burns, General Counsel	
Name of System: Symplicity HiRE Law Edition	
Date IRSD received PIA for review: May 23, 2011	Date IRSD completed PIA review: June 8, 2011
<p>Noted Issues:</p> <ul style="list-style-type: none"> • This system will collect and maintain personally identifiable information. • This system will operate as part of NRC's Privacy Act system of records NRC-28 Merit Selection Records. • OGC must obtain an OMB clearance for this system. • Records retention and disposition: <ul style="list-style-type: none"> ○ General Records Schedule (GRS) 1, Civilian Personnel Records, <ul style="list-style-type: none"> ▪ Item 33g which covers register or inventory of eligibles (OPM Form 5001-C or equivalent, documenting eligibility of an individual for Federal jobs.) Disposition: Destroy 2 years after the date on which the register of inventory is terminated. ▪ Item 33k which covers cancelled and ineligible applications for positions from an inventory. Disposition: Cut off annually. Destroy 1 year after cutoff. ○ Additionally, the ad hoc reports that are generated are covered under GRS 20, Downloaded and Copied Data, Item 12a. Disposition: Delete when they are no longer needed for administrative, legal, audit, or other operational purposes. 	
Russell A. Nichols, Chief Information Services Branch Information and Records Services Division Office of Information Services	Signature/Date: <i>/RA/ 06/08/2011</i>
<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>	