

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 collection requirements, and records management requirements.

>iGoFigure<

Date: June 10, 2016

A. GENERAL SYSTEM INFORMATION

1. Provide a detailed description of the system:

iGoFigure® Membership & Business Management Software makes it possible to easily manage a fitness center. It allows the tracking of members' attendance, results, and progress, organizes special populations based on health or medical considerations, and maintains a complete status history for each member. iGo Figure also provides robust membership reporting capabilities for effective health club management.

iGo Figure's primary focus is creating a high quality software product that effectively manages member and customer information, provides easy payment processing and money management, tracks inventory, includes robust reporting capabilities and reduces the time and effort involved with successfully running a business.

2. What agency function does it support?

The Nuclear Regulatory Commission (NRC) supports the Global Employee Health & Fitness Month (GEHFM) and supports health and fitness in the work place as a strategic goal. GEHFM is a yearly program that promotes an international and national observance of health and fitness in the workplace. This program was created by two non-profit organizations, the National Association for Health & Fitness and ACTIVE Life. The NRC supports the GEHFM by promoting the benefits of a healthy lifestyle to NRC employers through worksite health promotion activities such as cycle to work day, 5k runs and the expansion of the Fitness Center to accommodate more employee membership.

Formerly known as National Employee Health and Fitness Day, GEHFM has been extended to a month-long initiative in an effort to generate sustainability for a healthy lifestyle and initiate healthy activities on an ongoing basis.

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

iGoFigure is easy to use; member management with unattended member scan-in; multiple memberships; point of sale; 10 cent EFT; integrated billing & recurring payment; class scheduling; employee commissions & time clock; 100+ reports with custom reporting wizard; translated into 18 Languages; used by thousands of businesses in over 51 countries

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

5 U.S.C. 7901; Executive Order (E.O.) 9397, as amended by E.O. 13478

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

The purpose of the iGoFigure application system is to manage the member information regarding attendance and fitness level performance and progress. The Fitness Center staff uses the application to track member fitness goals, progress attendance to the personal training services and daily classes at the facility.

6. Points of Contact:

Project Manager	Office/Division/Branch	Telephone
Sarah Linnerooth Hoenig	OCHCO/HCAB	301-415-7113
Business Project Manager	Office/Division/Branch	Telephone
Pamela Davis-Ghavami	OCHCO/HCAB	301-287-0734
Technical Project Manager	Office/Division/Branch	Telephone
Brendan Cain/ Rick Grancorvitz	OCHCO/HCAB	301-287-0552/ 301-287-0805
Executive Sponsor	Office/Division/Branch	Telephone
Jeanne Dempsey	OCHCO/HCAB	301-287-0789

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)

Replaced the HealthCalc desktop application with iGo Figure application.

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

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

N/A

(2) If yes, provide a summary of modifications to the existing system.

N/A

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).

NRC employees who apply for membership at the Fitness Center, including current and former members.

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

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

The information maintained in the iGoFigure system is populated from the NRC Form 681 and additional information about fitness level and performance. The NRC's Fitness Center requires all members to complete the form and submit before becoming a member.

The specific data fields listed in the iGoFigure application are as follows:

Gender; FirstName; MiddleInitial; LastName; Home Location; Street1; Street2; City; State; Zip; Code; Country; Birthday ;Employee;

HomePhone1; HomePhone2; ;WorkPhone1 WorkPhone2 ;CellPhone1
 CellPhone2; Other Phone; Email1;
 Email2; Email3
 EmergContact_FirstName;EmergContact_MiddleInitial
 EmergContact_LastName; EmergContact_HomePhone1
 EmergContact_HomePhone2; EmergContact_WorkPhone1
 EmergContact_WorkPhone2; EmergContact_CellPhone1
 EmergContact_CellPhone2; EmergContact_OtherPhone
 MemberAttributes; StatusID; Membership; Primary
 Member_FirstName;Primary Member_MiddleInitial
 PrimaryMember_LastName PrimaryMember_RowNumber

Notes MemberImageMeasurementDay
 Meas_BustMeas_Wasit Meas_Abdomen Meas_Hips
 Meas_Thighs Meas_Calves Meas_Arms Meas_Weight
 Meas_Height Meas_BodyFatPercent Meas_BodyFatWt
 Meas_BMI Meas_RHR Meas_Shoulder Meas_Biceps
 NumWorkouts, Keytag#;

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

To the greatest extent possible, collect information about an individual directly from the individual.

(1) If yes, what information is being collected? Data from Form 681.

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 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?

g. How will information not collected directly from the subject individual be verified as current, accurate, and complete?

N/A

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

Form 681

2. INFORMATION NOT ABOUT INDIVIDUALS

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

No

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

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

No, the source of the information will come directly from the fitness member.

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.

Data used to monitor member's fitness level, track fitness progress, and also log facility entry time.

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?

Fitness center manager, staff and system administrator.

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?**

\\nrc.gov\nrc\hq\office\ochco\HCAB\IT\Fitness Center Software\iGoFigure\iGoFigure_New_User_Manual.pdf

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

No

Derived data is obtained from a source for one purpose and then the original information is used to deduce/infer a separate and distinct bit of information that is aggregated to form information that is usually different from the source information.

Aggregation of data is the taking of various data elements and then turning it into a composite of all the data to form another type of data (i.e. tables or data arrays).

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

N/A

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

N/A

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

N/A

6. **How will data be retrieved from the system? Will data be retrieved by an individual's name or personal identifier? (Be specific.)**

By Fitness member name or PIV card number.

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

Yes

- a. **If yes, explain.**

To track and monitor fitness level performance and improvements as well as identify member's date/time of entry.

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

Username and Password assigned for access.

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

Fitness Member Exercise Plan
Personal Training Test Results

a. What are the reports used for?

Track member's fitness level and fitness level improvements.

b. Who has access to these reports?

Fitness Center Manager and staff

D. ACCESS TO DATA

1. Which NRC office(s) will have access to the data in the system?

Fitness Center Manager and staff

(1) For what purpose?

To monitor members use of the facility and track members fitness goals.

(2) Will access be limited?

No

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?

N/A

3. Will external agencies/organizations/public have access to the data in the system?

No

- (1) If yes, who?
- (2) Will access be limited?
- (3) What data will be accessible and for what purpose/use?
- (4) How will the data be transmitted or disclosed?

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. The 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> ?

No

- a. 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?
- b. If the answer to question E.1 is yes, skip to F.1. If the response is no, complete question E.2 through question E.7.

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.

No

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?

Once the information is processed the members will review and can request for changes if any information is documented incorrectly.

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?**

The information will remain in the system. Fitness members who leave the agency will have their account disabled which is the current policy.

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?**

No.

7. **Does this system allow for the deletion or removal of records no longer needed and how will that be accomplished?**

Yes, the system does allow removal of records. The procedure is to disable members who leave the fitness center.

F. TECHNICAL ACCESS AND SECURITY

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

Need Username and Password to access the system.

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

Individual user account are assigned to iGoFigure users and requires an approved NRC employee badge to gain access to Fitness Center.

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

Yes

(1) If yes, where?

Yes, detailed instructions on how to access the iGoFigure tracking system, is documented in the NRC's Fitness Services contractor's Employee's Procedure Manual which outlines how to lock and secure membership information. All of the data from iGoFigure is saved in a separated restricted R drive.

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

No

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

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

NRC Application Administrator
NRC Fitness Center Director
NRC Fitness Center Staff.

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

Yes

a. If yes, what will be collected?

Date and time system was accessed by user account.

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

No

The application is a commercial off the shelf product which will be operated in an NRC facility.

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?

NRC's Fitness Center front desk is always monitored by one or more Fitness Center contractor employees at a time. All Fitness Center employees have successfully completed the required background and clearance process through the NRC. In addition, NRC's Fitness Services contract is required to go over the

Privacy Act notification and their responsibilities with all of their staff. The Fitness Services System of Records manager also sends annual guidance reminders on how to safeguard and prevent misuse of data. The Fitness Center closing procedures require that all programs and computers are logged off and completely shut down at COB.

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

Yes

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

March 24, 2014

PRIVACY IMPACT ASSESSMENT REVIEW/APPROVAL
(For Use by OCIO/CSD Staff)

System Name: iGoFigure

Submitting Office: Office of the Chief Human Capital Officer, Human Capital Analysis Branch

A. PRIVACY ACT APPLICABILITY REVIEW

Privacy Act is not applicable.

Privacy Act is applicable.

Comments:

The iGoFigure is covered by NRC's Privacy Act System of Records NRC 44, Employee Fitness Center Records. The iGoFigure does maintain PII information and information on persons to be notified in case of emergency (name, address, telephone number) which could be about members of the public.

Reviewer's Name	Title	Date
Sally Hardy	Acting Privacy Officer	June 17, 2016

B. INFORMATION COLLECTION APPLICABILITY DETERMINATION

No OMB clearance is needed.

OMB clearance is needed.

Currently has OMB Clearance. Clearance No. _____

Comments:

The information maintained within the iGoFigure system does not constitute an Information collection under the Paperwork Reduction Act. No information is gathered from the public, therefore, no OMB clearance is needed.

Reviewer's Name	Title	Date
Brenda P. Miles	Information Management Analyst	June 17, 2016

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

TO: Jeanne Dempsey, Chief, Office of the Chief Human Capital Officer, Human Capital Analysis Branch	
Name of System: iGoFigure	
Date CSD received PIA for review: June 10, 2016	Date CSD completed PIA review: June 17, 2016
Noted Issues: The iGoFigure is covered by NRC's Privacy Act System of Records NRC 44, Employee Fitness Center Records.	
Kimyata MorganButler, Chief FOIA, Privacy, and Info Collections Branch Customer Service Division Office of the Chief Information Officer	Signature/Date: /RA/ 6/30/2016
<i>Copies of this PIA will be provided to:</i> <i>John Moses, Director Solutions Develop Division Office of the Chief Information Officer</i> <i>Kathy Lyons-Burke Senior IT Security Officer (SITSO) FISMA Compliance and Oversight Team Computer Security Office</i>	