

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.

Recruitment Activity Tracking System (RATS)

Date: June 16, 2016

A. GENERAL SYSTEM INFORMATION

1. Provide a detailed description of the system:

The former Recruitment Activity Tracking System (RATS) is now called Departures and Exit Surveys and is a web-based database used to send out and record Exit Surveys to departing employees. This is used for the purpose of obtaining feedback from employees on their various reasons for leaving the agency.

2. What agency function does it support?

This supports the office of Human Resources (HR), HCAB and helps to improve employee/management relations, realize and correct issues on various levels and provide feedback to management on areas of improvement.

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

HCAB enters employees who will be leaving the agency into the system. They track the number of departing employees in the reports. The automated part runs a nightly file to review for employees departing the agency within two weeks and sends them an email notifying them of the Exit survey to fill out prior to their departure. The employee fills out the survey. The results are compiled by HCAB for the improvement of the agency.

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

U.S. Code Title 5 Section 1104 (5 USC 1104)

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

To determine areas of improvement within the agency. The system collects employee name, type of separation, date of departure, office, title, grade, appointment type, funding type along with all of the survey questions which consist of 5 categories involving work/life, benefits, management/organization, environment and family/personal questions.

6. Points of Contact:

Project Manager	Office/Division/Branch	Telephone
Rick Grancorvitz	OCHCO/HCAB	301-287-0805
Business Project Manager	Office/Division/Branch	Telephone
Technical Project Manager	Office/Division/Branch	Telephone
William J. Lawson	OCHCO/ADHRTD/STTSB	423-855-6645
Executive Sponsor	Office/Division/Branch	Telephone
Miriam Cohen	OCHCO	301-287-0747

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.**

ML081050423

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

PII was removed from the system. The RATS application is no longer used and was replaced by WTTS. The only section of the original application that is still used is the Exit Survey section.

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).

Federal employees.

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

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

Separation Data: Employee name, type of separation, date of departure, funding type, office, title, grade, appointment type, hours worked, survey responses: 5 categories of determining factors on reasons an employee leaves the agency.

c. Is information being collected from the subject individual?

Yes.

(1) If yes, what information is being collected?

Yes, personal opinions in the survey responses.

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?

Yes.

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

HRMS Human Resource Management System database: grade, office, appointment type.

- 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?**

Information is verified during exit interview.

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

Interface with HRMS and entry by HCAB employees and employee responses in survey.

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.**

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.**

Tracking departures, soliciting feedback from employees on organization, providing areas of improvement to HR.

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?

HR application administrator controls user access.

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

No.

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

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?

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

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

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

Records are retrieved by selecting employee name from a dropdown list. However, actually employee ID is used to query the database. Reports are run based on departure date, office.

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

Departure Summary Report.

a. What are the reports used for?

To determine the number of employees leaving the agency within a timeframe.

b. Who has access to these reports?

Authorized system users.

D. ACCESS TO DATA

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

HCAB.

(1) For what purpose?

To plan for departing employees, solicit feedback on their reasons for leaving, and to review agency issues if identified in the surveys.

(2) Will access be limited?

Yes.

4. 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?

5. 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> ?**

Yes.

- 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?**

GRS 2.5. Temporary. Destroy 2 years after date of program closure, but longer retention is authorized if required for business use.

NOTE: HRSO Staff indicates that *Record will be destroyed two years after employee separation.*

- 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.**
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?**

NO

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

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

Once authenticated to the NRC LAN a user will have access to the system via single sign-on. Authentication to the NRC LAN is multi-factored.

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

None.

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

No.

(1) **If yes, where?**

6. **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?**

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

System Administrator, application administrator, and HCAB users.

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

Yes.

a. **If yes, what will be collected?**

Date/time and user ID when records are inserted and modified.

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

Yes.

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.*

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

Access level controls are in place and a record of the date/time and user ID are kept when records are inserted or modified.

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

Yes.

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

System was authorized in October 2013 and has had periodic system control assessments every year since then.

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

System Name: Recruitment Activity Tracking System (RATS)

Submitting Office: Office of the Chief Human Capital Officer

A. PRIVACY ACT APPLICABILITY REVIEW

Privacy Act is not applicable.

Privacy Act is applicable.

Comments:

Maintained as part of the NRC's Privacy Act System of Records NRC-28, Merit Selection Records.

Reviewer's Name	Title	Date
Sally A. Hardy	Acting Privacy Officer	June 28, 2016

B. INFORMATION COLLECTION APPLICABILITY DETERMINATION

No OMB clearance is needed.

OMB clearance is needed.

Currently has OMB Clearance. Clearance No. _____

Comments:

Reviewer's Name	Title	Date
David Cullison	Agency Clearance Officer	6/20/2016

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:

The records in RATS are covered under NARA approved GRS 2.5, Employee Separation Records. The disposition is:

Temporary: Destroy 2 years after date of program closure, but longer retention is authorized if required for business use.

Adherence to the GRS is mandatory under 44 U.S.C. 3303a(d). Retention functionality or a manual process must be developed to meet this requirement.

Reviewer's Name	Title	Date
Mary L. Haynes	Records Management Analyst	June 28, 2016

D. BRANCH CHIEF REVIEW AND CONCURRENCE

- 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 David Cullison for/
Kimyata MorganButler, Chief
FOIA, Privacy, Info Collections Branch
Customer Service Division
Office of the Chief Information Officer

Date 7/07/2016

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

TO: Miriam L. Cohen, Office of the Chief Human Capital Officer	
Name of System: Recruitment Activity Tracking System (RATS)	
Date CSD received PIA for review: June 17, 2016	Date CSD completed PIA review: June 28, 2016
Noted Issues: The system has been revised and all PII was removed from the system. The only section of the original application that is still used is the Exit Survey section, which collects only work related information from employees leaving the agency.	
Kimyata MorganButler, Chief FOIA, Privacy, and Info Collections Branch Customer Service Division Office of the Chief Information Officer	Signature/Date: /RA David Cullison for/ 7/07/2016
<i>Copies of this PIA will be provided to:</i> <i>John Moses, Director Solutions Develop Division Office of Information Services</i> <i>Kathy Lyons-Burke Senior IT Security Officer (SITSO) FISMA Compliance and Oversight Team Computer Security Office</i>	