

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.

Reasonable Accommodation Tracking Tool

Date: 11/22/2016

A. GENERAL SYSTEM INFORMATION

1. Provide a detailed description of the system:

The Reasonable Accommodation Tracking Tool is located on the Office of the Chief Human Capital Office (OCHCO) SharePoint site, internal to the Nuclear Regulatory Commission (NRC) and will replace an existing Access database which is used to track employee requests for reasonable accommodations.

2. What agency function does it support?

The NRC has committed to increase the population of employees with disabilities at the NRC to 2% in accordance with the agency's Disability Strategic Plan.

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?

Executive Order 13164 states that an agency's procedures must:

"Ensure that agencies' systems of recordkeeping track the processing of requests for reasonable accommodation and maintain the confidentiality of medical information received in accordance with applicable law and regulations." (Order, Section 1(b)(9))

The Order does not require that agencies maintain particular recordkeeping systems, documents, or databases. Nonetheless, all agencies must be able to identify at least the following information:

- the number and types of reasonable accommodations that have been

requested in the application process and whether those requests have been granted or denied;

- the jobs (occupational series, grade level, and agency component) for which reasonable accommodations have been requested;
- the types of reasonable accommodations that have been requested for each of those jobs;
- the number and types of reasonable accommodations for each job, by agency component, that have been approved, and the number and types that have been denied;
- the number and types of requests for reasonable accommodations that relate to the benefits or privileges of employment, and whether those requests have been granted or denied;
- the reasons for denial of requests for reasonable accommodation;
- the amount of time taken to process each request for reasonable accommodation; and
- the sources of technical assistance that have been consulted in trying to identify possible reasonable accommodations.

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

Based on the Executive Order 13164, all agencies are required to track reasonable accommodations requests. The Reasonable Accommodation Tracking Tool will be used to track employee requests for reasonable accommodations.

6. Points of Contact:

Project Manager	Office/Division/Branch	Telephone
Kimberly Meyer	OCHCO/ PLERB	301-287-0739
Business Project Manager	Office/Division/Branch	Telephone
Barbara Sanford	OCHCO/PLERB	301-287-9260
Technical Project Manager	Office/Division/Branch	Telephone
Sally Wilding	OCHCO/HCAB	301-287-0596
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?**
- No
- (1) **If yes, provide the date approved and ADAMS accession number.**
- (2) **If yes, provide a summary of modifications to the existing system.**

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 requesting a reasonable accommodation.
- (2) **IF NO, SKIP TO QUESTION B.2.**
- b. **What information is being maintained in the system about an individual (be specific)?**
- The following information is being maintained: name, accommodation being requested, accommodation type, impairment, disability type, disability condition, 504/508 explanation, and case notes. **Medical documentation is not uploaded to SharePoint.**

c. Is information being collected from the subject individual?

Yes. Information may also be submitted by an employee's supervisor.

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

The following information is being collected: name, title, grade, series, agency email address, office, duty station, supervisor name, supervisor email address, supervisor phone number, accommodation being requested, type of accommodation request, impairment type, major life activity affected, disability type, and disabling condition.

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?

The Disability Program Manager, or designee(s), will verify the currency, accuracy and completeness of data.

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

Information is being collected primarily through the completion of NRC Form 726, but some information may be collected via email. The form is maintained in a case file associated with the request.

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.

The SharePoint list will replace an existing Access database and will be used to track reasonable accommodation requests and provide statistical information on types of accommodation requests.

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 Disability Program Manager, or designee(s) is responsible for ensuring the proper use of the information.

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

No. The data elements are available in the settings of the SharePoint list.

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.

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.)

Information will be retrieved by employee name or case type.

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.

There are no formal reports produced. There will be an ability to produce reports, if necessary, in the future. The Disability Program Manager, or designee(s) may provide statistical data to NRC management upon request.

a. What are the reports used for?

b. Who has access to these reports?

D. ACCESS TO DATA

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

Access to the data is limited to designated staff in OCHCO. No other offices will have access to the data.

(1) For what purpose?

(2) Will access be limited?

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?

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?

The information in SharePoint will be assessed with the office using the [Records and Information Management \(RIM\) Certification](#) process to ensure electronic recordkeeping procedures and controls are in place to manage the data and information appropriately. This can be done during the development and implementation and does not delay the PIA. Other information and records generated that are not put into SharePoint will be assessed using the Information Inventory (NUREG 0910) which includes the GRS.

GRS 1.24 [Reasonable Accommodation Request Records](#)

GRS 1.24.a: General Files

Destroy three years after supercession or when no longer needed for reference whichever is later. (N1-GRS-04-2 item 1a)

GRS 1.24.b: Employee Case Files

Destroy three years after employee separation from the agency or all appeals are concluded whichever is later. (N1-GRS-04-2 item 1b)

[Note: These records are neither part of an employee's Official Personnel File (OPF) nor part of a supervisor's unofficial personnel file.]

GRS 1.24.c: Supplemental Files

Destroy three years after end of fiscal year in which accommodation is decided or all appeals are concluded, whichever is later. (N1-GRS-04-2 item 1c) [Note: These records are neither part of an employee's Official Personnel File (OPF) nor part of a supervisor's unofficial personnel file. (N1-GRS-04-2 item 1c Note)]

GRS 1.24.d: Tracking System

Delete/destroy three years after compliance report is filed or when no longer needed for reference. (N1-GRS-04-2 item 1d)

- 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.**

Agencies should keep records related to a particular individual who has requested a reasonable accommodation for the duration of that individual's employment.

Agencies should keep any cumulative records used to track the agency's performance with regard to reasonable accommodation for at least three years.

Would these records be of value to another organization or entity at some point in time? Please explain.

3. **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?**
4. **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?**
5. **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?**
6. **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).**

Access to information will be restricted using SharePoint permissions.

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

The Disability Program Manager, or designee(s) is/are the sole user(s) of the system. Access will be controlled by the use of SharePoint permissions. The information will not be accessible by unauthorized users.

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

No. OCHCO uses an internal SharePoint list to request and track access requests. The Disability Program Manager may submit an access request to add or remove a designated back-up.

(1) If yes, where?

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

Yes. Designated OCHCO users may access SharePoint remotely via the NRC VPN or Citrix environments.

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

Users are required to adhere to NRC's policies for computer use.

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

The Disability Program Manager, or designee(s), Branch Chief of the Policy, Employee and Labor Relations Branch, and OCHCO SharePoint administrator(s) will have access to the Reasonable Accommodation SharePoint list.

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

Yes.

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

The Versioning feature in SharePoint will capture the user and timestamp associated with any changes and will list values of modified fields.

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

No.

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

SharePoint permissions will ensure that only approved users have access to the data. The Versioning feature in SharePoint will capture the user and timestamp associated with any changes and will list values of modified fields.

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

Yes.

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

Not accredited.

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

System Name: Reasonable Accommodation Tracking Tool

Submitting Office: Office of Chief Human Capital Officer

A. PRIVACY ACT APPLICABILITY REVIEW

Privacy Act is not applicable.

Privacy Act is applicable.

Comments:

Form 726 is used to collect this information and the information in the system is retrieved by an individual's name. Form 726 will need to be updated to include a Privacy Act Statement. The system is covered by NRC 11 – General Personnel Records.

Reviewer's Name	Title	Date
Sally A. Hardy	Acting Privacy Officer	12/01/2016

B. INFORMATION COLLECTION APPLICABILITY DETERMINATION

No OMB clearance is needed.

OMB clearance is needed.

Currently has OMB Clearance. Clearance No. _____

Comments: No OMB Clearance is needed since information is being collected only from Federal employees.

Reviewer's Name	Title	Date
David Cullison	Agency Clearance Officer	11/28/2016

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:

Additional information is needed on what records per the GRS are being stored in SharePoint and in other locations (share drives, paper, etc) in order to ensure compliance with recordkeeping standards.

The RIMCert process in conjunction with the Information Inventory for the office (NUREG 0910 Records Schedule) can assist in identifying how to properly manage all related data, whether in SharePoint, ADAMS, on the Form 726, in employee case files, etc. This will ensure NRC and NARA recordkeeping guidelines (General Records Schedule - GRS 1.24) are being applied appropriately.

Reviewer's Name	Title	Date
Marna B. Dove	Sr. Information Management Analyst Electronic Records Manager	11/30/2016

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/ Date 12/15/2016
Anna T. McGowan, Chief
FOIA, Privacy, and Info Collections Branch
Customer Service Division
Office of the Chief Information Officer

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

To: Miriam Cohen, Office of Chief Human Capital Officer	
Name of System: Reasonable Accommodation Tracking Tool	
Date CSD received PIA for review: November 22, 2016	Date CSD completed PIA for review: December 1, 2016
Noted Issues: Form 726 is used to collect this information and the information in the system is retrieved by an individual's name. Form 726 will need to be updated to include a Privacy Act Statement. The system is covered by NRC 11 – General Personnel Records. OGC has reviewed and agrees.	
Anna T. McGowan, Chief FOIA, Privacy, and Info Collections Branch Customer Service Division Office of the Chief Information Officer	Signature/Date: /RA/ 12/15/2016
<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 Information Security Directorate Office of the Chief Information Officer</i>	