

## 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.*

### for the **Drug Testing Tracking System (DTTS)**

**Date:** April 20, 2017

#### **A. GENERAL SYSTEM INFORMATION**

**1. Provide a detailed description of the system:**

DTTS is a case management and random drug pool generation system that is currently used to track drug testing records and generate random drug test pools. DTTS is a client application that resides on a stand-alone workstation located in the secure Drug Testing Program office.

**2. What agency function does it support?**

NRC's Drug-Free Workplace Program. DTTS aligns with the NRC Strategic Plan areas:

**“Organizational Excellence: Operational Excellence”**

(3) Improve support services to make them more efficient and make it easier to accomplish agency goals.

(4) Manage agency information and employ information technology to improve the productivity, effectiveness, and efficiency of agency programs and enhance the availability and usefulness of information to all users inside and outside the agency.

**“IT Strategic Plan Information”**

(2) Improve information and records management processes, such as information dissemination and knowledge management.

The vision for DTTS is to integrate many of the manual processes and interfaces into one cohesive system that can meet both the compliance reporting of DFS on the drug testing program and Drug-Free Workplace Program.

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

N/A

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

Executive Order 12564, Section 503 of Public Law 100-71, 5 U.S.C. 7301

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

DTTS will provide a single solution for the Drug Testing Program staff to manage creating random drug test pools and tracking drug test results. This will improve functionality, data integrity and reporting capabilities for managing the Drug Testing Program.

Data to be collected:

Name,  
Date of Birth (D.O.B.),  
Social Security Number (SSN),  
Office,  
Position,  
Drug Test Dates,  
Drug Test Results,

**6. Points of Contact:**

<b>Project Manager</b>	<b>Office/Division/Branch</b>	<b>Telephone</b>
Nancy Turner Boyd	ADM/DFS/PSB	301-415-6645
<b>Business Project Manager</b>	<b>Office/Division/Branch</b>	<b>Telephone</b>
Chris Heilig	ADM/DFS/PSB	301-415-7731
<b>Technical Project Manager</b>	<b>Office/Division/Branch</b>	<b>Telephone</b>
Karen Cudd	ADM/PMDA/ITT	301-492-3691
<b>Executive Sponsor</b>	<b>Office/Division/Branch</b>	<b>Telephone</b>
Cynthia Carpenter	ADM	301-492-3500

**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)

DTTS will replace the current EDTTS system and software being used to manage the Drug Testing Program and create random drug testing pools. The data being collected will not change.

b. **If modifying an existing system, has a PIA been prepared before?**

Yes

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

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**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  
Federal contractors;  
Applicants for employment with NRC

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

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

Name,  
D.O.B.,  
SSN,  
Office,  
Position,  
Drug Test Dates,  
Drug Test Results,

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

No.

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

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

No. Information is NOT being obtained directly from the individual. PSB receives this information from the security authorization form and

information is transferred to the donor's chain-of-custody form during testing. The authority for authorization for this form is OMB No. 0930-0158.

**(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.**

Data will be extracted from the Department of Interior's (DOI) Federal Personnel/Payroll System (FPPS) and loaded into DTTS.

**f. Is the information being collected from external sources (any source outside of the NRC)?**

Yes.

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

Information is collected about an individual's drug test results by NRC's Medical Review Officer (MRO).

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

Individual identifying information is cross checked from chain-of-custody form (OMB No. 0930-0158). The multi-part form contains specimen ID number and donor information that ties the urine specimen with the correct donor, this information is verified by the donor at the time of collection.

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

Medical Review Officer receives results from the drug testing laboratory and mails chain-of-custody forms to the NRC DTP.

## **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.**

Data in this system will be used to determine if an employee or contractor in a sensitive position is suitable for Government employment.

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?**

Drug Testing Program staff

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?**

DTTS User Guide, located on DTTS workstation  
NRC-35 Drug Testing Program Records

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.)**

List of names of those people who need to report for drug testing will be automatically generated.

Information about an individual will be retrieved using their Name and/or SSN.

**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.**

- A list of employees/contractors who must report for random drug testing
- A report of the number of drug test conducted, dates, & results
- Notification of drug test results

**a. What are the reports used for?**

The list of employees will be used to have those people on the list report for drug testing.

The report of number of drug test conducted, dates, & results will be used for reporting up to Management.

Notification of drug test results will be sent to the person being tested.

**b. Who has access to these reports?**

Drug Testing Program staff  
ADM Managers with need to know.  
OGC Attorneys with need to know.  
OCHCO Management with need to know.

**D. ACCESS TO DATA**

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

ADM

**(1) For what purpose?**

Management of the NRC Drug Testing Program

**(2) Will access be limited?**

Yes.

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

Yes

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

Personnel Security Adjudication Tracking System (PSATS)  
Department of Interior's (DOI) Federal Personnel/Payroll System (FPPS)

**(2) How will the data be transmitted or disclosed?**

Data about an individual will be extracted from DTTS onto an NRC MXI Thumb Drive and loaded into PSATS only for the pre-employment drug test type.

Data about an individual will be extracted from FPPS onto an NRC MXI Thumb Drive and loaded into DTTS.

**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?

General Records Schedules GRS 1, Civilian Personnel Records, Item 36, Federal Workplace Drug Testing Program Files,

- Item 36b
- Item 36c
- Item 36d (1)
- Item 36d (2)
- Item 36e (2)
- Item 36e (2) Note (1)
- Item 36e (2) Note (2)

- 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?
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).



- The workstation is standalone and located in the locked Drug Testing Program office. Only Drug Testing Program staff will have keys/combination to the office and content.
- Access to DTTS will be limited to the Drug Testing Program staff. Staff must login to the system with a User ID and password.
- The ADM System Administrator will have access to the workstation to apply operating system patches, security patches, and software updates and to assist with SQL statements for adhoc reporting.

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

NRC Information Technology Rules of Behavior and there is an audit trail of system access, data insert, update and delete.

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

No

(1) If yes, where?

**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?**

Drug Testing Program Staff  
ADM System Administrator

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

Yes.

a. If yes, what will be collected?

Audit Trail of system access, data insert, update, delete.

**7. 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.*

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

Log into system with USERID/Password  
Audit trails of system activity built into the application.

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

Yes

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

DTTS has replaced the current EDTTS and will be part of ADM's MASS C&A boundary.

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

**System Name:** Drug Testing Tracking System (DTTS)

**Submitting Office:** Office of Administration

**A. PRIVACY ACT APPLICABILITY REVIEW**

Privacy Act is not applicable.

Privacy Act is applicable.

**Comments:**

DTTS contains personally identifiable information (PII) and is covered by Privacy Act systems of records: NRC-35, Drug Testing Program Records.

Reviewer's Name	Title	Date
Sally A. Hardy	Acting Privacy Officer	April 18, 2017

**B. INFORMATION COLLECTION APPLICABILITY DETERMINATION**

No OMB clearance is needed.

OMB clearance is needed.

Currently has OMB Clearance. Clearance No. 0930-0158

**Comments:**

OMB Clearance expires on 5/31/2017

Reviewer's Name	Title	Date
David Cullison	Agency Clearance Officer	04/11/2017

**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.



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

TO: <b>Cynthia Carpenter, Director, Office of Administration</b>	
Name of System: <b>Drug Testing Tracking System (DTTS)</b>	
Date GEMS received PIA for review: <b>April 4, 2017</b>	Date GEMS completed PIA review: <b>April 18, 2017</b>
<b>Noted Issues:</b>  Information in DTTS is covered by Privacy Act systems of records: NRC-35, Drug Testing Program Records	
Anna T. McGowan, Chief Information Services Branch Governance & Enterprise Management Services Division Office of the Chief Information Officer	Signature/Date  <b>/RA/ April 20, 2017</b>
<i>Copies of this PIA will be provided to:</i>  <i>Tom Rich, Director IT Services Development &amp; Operation Division Office of the Chief Information Officer</i>  <i>Jonathan Feibus Chief Information Security Officer (CISO) Governance &amp; Enterprise Management Services Division Office of the Chief Information Officer</i>	