

## 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.*

## Human Resources Management System (HRMS)

**Date:** October 10, 2018

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

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

The Human Resources Management System (HRMS) is owned by the Office of the Chief Financial Officer (OCFO). HRMS is used to capture time, attendance, and labor data. HRMS contains a customized commercial off-the-shelf (COTS) product from Oracle PeopleSoft (PS). The PS product provides four modules: human resources (HR), time and labor (T&L), training administration (TA), and payroll. HRMS only uses the T&L module and provides historical HR and payroll information. The T&L module requires all employees to be self-reporters and to enter time taken for vacation, sick leave, jury duty, etc. It also tracks monthly leave accrual (vacation and sick hours earned each month vs. hours taken), and tracks positive pay and leave (exception) time.

HRMS is a subsystem of the OCFO Financial Management System (FMS) FISMA boundary. FMS will provide the framework for managing cybersecurity compliance for OCFO financial services and systems used by NRC. FMS is an umbrella system that consists of subsystems which support mission and business functions that OCFO provides for the agency.

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

HRMS supports recording of employee activity-based hours to be used primarily for payroll and fee billing.

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

Time and Labor (from 11/2001 to date) maintains employee activity-based hourly reporting.

Historical HRMS Human Resources (01/1975 to 11/2003) has the full range of personnel data from when the NRC was processing HR-related transactions directly into HRMS.

Historical HRMS Payroll (11/2001 to 11/2003) database contains payroll transactions from 01/1975 to 11/2001. Historical payroll data will continue to be accessible by only OCFO payroll staff for reporting purposes.

HRMS Training (1/1975 to 4/2008) maintains employee training and development records.

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

26 Code of Federal Regulations 31.6011(b)(2), 31.6109-1; 5 United States Code (U.S.C.) 6334; 5 U.S.C. Part III, Subpart D; 31 U.S.C. 716; 31 U.S.C. Chapters 35 and 37.

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

The purpose is to collect time and attendance data for payroll processing; formulating and executing budgets, operations planning, workload planning, labor data reporting, performance monitoring, reporting on resource expenditures, billing NRC licensees and managing costs associated with collecting fees.

**6. Points of Contact:**

<b>Project Manager</b>	<b>Office/Division/Branch</b>	<b>Telephone</b>
Sharon Clarkson	OCFO/DOC/FSB	301-415-8483
<b>Business Project Manager</b>	<b>Office/Division/Branch</b>	<b>Telephone</b>
Erikka LeGrand	OCFO/DOC/PPB	301-415-7748
<b>Executive Sponsor</b>	<b>Office/Division/Branch</b>	<b>Telephone</b>
Maureen E. Wylie	OCFO	301-415-7322

**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?**

Yes

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

**Date:** April 2011, **ADAMS #** ML111170543

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

HRMS was previously authorized as a separate system and now it is incorporated into the FMS FISMA boundary as a subsystem.

**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)?**

The information and data maintained in the system is general employee personnel records, salaries and benefits, leave balances, payroll data, time and attendance data, activity-based work hours and historical training data.

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

Yes

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

The data being collected from individuals includes name, address, social security number, databank account, time and attendance, and budget execution data.

**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.**

Employee assignment data, Enterprise Project Identifiers (EPIDs), Cost Activity Codes (CACs), and Dockets data are collected from Cost Activity Code System (CACs).

**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?**

The source is an ASCII text file from the Department of Interior's (DOI) Federal Payroll and Personnel System (FPPS). The type of information is employee demographics, salary and benefits, leave balances and payroll.

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

Data is verified through the OCFO reconciliations, Standard Form 52s, and Earnings and Leave statements.

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

The information is collected via ASCII text files and database transfers.

**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).**

Activity codes against which employees charged their time, and office designations.

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

The source of this information comes from Internal and external systems. Internal systems include the RRPS system, EPM, CACS and the external system is DOI FPPS. The information is transferred via database to database and/or ASCII text files.

**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.**

Uses of the data are as follows: data transmissions to DOI for paycheck and leave balances calculations, license fees billings, updates to the agency's core financial system, financial reporting, project management, salary and benefits modeling, cost accounting modeling, and strategic workforce planning.

**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?**

All NRC employees

**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?**

PeopleBooks, which was delivered with the Oracle PeopleSoft product and is located on-line on the HRMS servers.

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

Yes

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

The aggregated data will be maintained in the HRMS T&L system. A small subset of this data is also in the NRC's financial and CACS systems and DOI's FPPS. Information is maintained electronically by personnel specialists or payroll operations staff. Hard copy documentation is kept in the employee's time and attendance folders. Aggregate information is used to manage labor cost data for the purposes of employee wage and compensation.

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

To assure data integrity and internal controls, data discrepancy reports have been created. Office of the Chief Human Capital Officer (OCHCO) and OCFO investigate any discrepancies that they discover or that are brought to their attention by employees. Agency policies on information integrity, security, and roles and responsibilities are documented in a

series of Management Directives relating to personnel and financial information.

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

Data access is restricted in the HRMS system based on role and need-to-know. Internal agency policies and procedures define controls and protections based on OMB requirements and NIST guidelines. Controls are audited and tested routinely to assure adequate protections from unauthorized access, use, or modification. The system utilizes user ID and password protections and relies on parameter defenses to protect the systems and records.

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

Data is retrieved by a system-generated employee identification number (employee ID) and/or employee last name / first name

**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.**

Employee-level historical personnel actions, organization/position, salary/awards and compensation, leave/time and attendance, retirement and budgetary and labor cost information, license fee, and cost reimbursements.

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

The reports are used for OCHCO management, workforce planning, payroll processing and reporting, labor cost reporting, and financial accounting purposes.

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

Staff from OCHCO, OCFO, Office of the Chief Information Officer (OCIO), and Office-designated T&L Coordinators based on relevance to the functions each office performs.

**D. ACCESS TO DATA**

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

All NRC Offices have access.

**(1) For what purpose?**

For employee time entry, approvals, and reporting of activities.

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

Yes, access will be limited based on roles and responsibilities with need-to-know to perform official duties.

**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).**

CACS, FAIMIS, FPPS, BFS, iLearn

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

Information is transmitted over a dedicated line. Data files are either transmitted to other agencies or downloaded from their sites to NRC.

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

Yes but no direct system access. Data is shared via ASCII text files.

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

DOI and Office of Personnel Management (OPM)

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

Yes, access will be limited based on roles and responsibilities with need to know to perform official duties.

**(3) What data will be accessible and for what purpose/use?**

Employee name, address, social security number, banking information, salary and time worked. Information is used for employee reporting, payroll, and system maintainability.

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

The information is transmitted through file downloads over a dedicated line.

**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?

Old GRS	New GRS	Title	Disposition Instructions
1-1.b-OPF	2.2 item 040	OPF/eOPF Long-term records	Temporary. Destroy when survivor or retirement claims are adjudicated or when records are 129 years old, whichever is sooner, but longer retention is authorized if required for business use.
1-10	2.2 item 041	OPF/eOPF Short-term records	Temporary. Destroy when superseded or obsolete, or upon separation or transfer of employee, whichever is earlier.
	2.2 item 060	Employee eligibility verification records	Temporary. Destroy 3 years after employee separates from service or transfers to another agency.
1-3.a(4)	2.2 item 070	Employee performance file system records. Acceptable performance appraisals of non-senior executive service employees.	Temporary. Destroy no sooner than 4 years after date of appraisal, but longer retention is authorized if required for business use.
1-23.a(3)(a)	2.2 item 070	Employee performance file system records. Acceptable performance appraisals of non-senior executive service employees	Temporary. Destroy no sooner than 4 years after date of appraisal, but longer retention is authorized if required for business use.
1-23.b(3)	2.2 item 072	Employee performance file system records. Records of senior executive service employees	Temporary. Destroy no sooner than 5 years after date of appraisal, but longer retention is authorized if required for business use.
1-23.b(2)(a)	2.2 item 072	Employee performance file system records. Records of senior executive service employees	Temporary. Destroy no sooner than 5 years after date of appraisal, but longer retention is authorized if required for business use.
1-29.b	2.6 item 010	Non-mission employee training program records	Temporary. Destroy when 3 years old, but 3 years after superseded or obsolete, whichever is appropriate, but longer retention is authorized if required for business use.

	2.6 item 030	Individual employee training records	Temporary. Destroy when superseded, 3 years old, or 1 year after separation, whichever comes first, but longer retention is authorized if required for business use.
2-1.a	rescinded		
2-1.b	2.4 item 040	Agency payroll record for each pay period	Temporary. Destroy when 56 years old.
2-2	rescinded		
2-7	2.4 item 030	Time and attendance records	Temporary. Destroy after GAO audit or when 3 years old, whichever is sooner.
2-8	2.4 item 030	Time and attendance records	Temporary. Destroy after GAO audit or when 3 years old, whichever is sooner.
2-9.b	2.5 item 020	Individual employee separation case files	Temporary. Destroy 1 year after date of separation or transfer, but longer retention is authorized if required for business use.
2-13.a	2.4 item 020	Tax withholding and adjustment documents	Temporary. Destroy 4 years after superseded or obsolete, but longer retention is authorized if required for business use.
2-13.b	2.4 item 050	Wage and tax statements	Temporary. Destroy when 4 years old, but longer retention is authorized if required for business use.
2-14.a	rescinded		
2-15.a	2.4 item 010	Records used to calculate payroll, arrange paycheck deposit, and change previously issued paychecks.	Temporary. Destroy 2 years after employee separation or retirement, but longer retention is authorized if required for business use.
2-15.b	2.4 item 010	Records used to calculate payroll, arrange paycheck deposit, and change previously issued paychecks.	Temporary. Destroy 2 years after employee separation or retirement, but longer retention is authorized if required for business use.
2-18	2.4 item 010	Records used to calculate payroll, arrange paycheck deposit, and change previously issued paychecks.	Temporary. Destroy 2 years after employee separation or retirement, but longer retention is authorized if required for business use.
2-22.c	2.4 item 061	Payroll program administrative records. Payroll system reports providing fiscal information on agency payroll.	Temporary. Destroy when 3 year old or after GAO audit, but longer retention is authorized if required for business use.
2-22.a	2.4 item 060	Payroll program administrative records. Administrative correspondence between agency and payroll processor, and system reports used for agency workload and or personnel management purposes.	Temporary. Destroy when 2 years old, but longer retention is authorized if required for business use.

2-23.a	2.4 item 010	Records used to calculate payroll, arrange paycheck deposit, and change previously issued paychecks.	Temporary. Destroy 2 years after employee separation or retirement, but longer retention is authorized if required for business use.
20-3.a	rescinded		

**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).**  
  
HRMS users (staff) login through ITI/ICAM multi-factor authentication - single sign on.
- 2. What controls will prevent the misuse (e.g., unauthorized browsing) of system data by those having access?**  
  
Access will be monitored. Audit trails track user access by User ID with date and time stamps and will be periodically reviewed by the assigned ISSO designees.
- 3. Are the criteria, procedures, controls, and responsibilities regarding access to the system documented?**  
  
Yes  
  
**(1) If yes, where?**

On an NRC network server. Documentation is also available in Management Directives, in HRMS online help, and on the OCFO web page.

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

Yes

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

All sites access the same database located at headquarters.

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

There are several user groups that have access to the system. All employees for time entry are in an Employee group. Timekeepers are in a Timekeeper group. T&L Coordinators are in the Coordinator group. OCHCO and T&L have their own groups. Payments and Payroll Branch (PPB) and HRMS Operations and Maintenance team and System administrators are in an all-inclusive access group.

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

Yes

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

User ID, time, and date stamp.

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

Yes, to perform timekeeping activities, system maintenance, and operations and development.

*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?**

All access to the HRMS system is captured in system log files and audit records.

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

Yes

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

December 12, 2016

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

**System Name:** Human Resources Management System (HRMS)

**Submitting Office:** Office of the Chief Financial Officer (OCFO)

**A. PRIVACY ACT APPLICABILITY REVIEW**

Privacy Act is not applicable.

Privacy Act is applicable.

**Comments:**

The information will be maintained as part of NRC's Privacy Act System of Records NRC-11, General Personnel Records; NRC-19, Official Personnel Training Records; and NRC-21, Payroll Accounting Records. This system contains personally identifiable information.

Reviewer's Name	Title	Date
Sally A. Hardy	Privacy Officer	11/26/2018

**B. INFORMATION COLLECTION APPLICABILITY DETERMINATION**

No OMB clearance is needed.

OMB clearance is needed.

Currently has OMB Clearance. Clearance No. \_\_\_\_\_

**Comments:**

No clearance is needed as information is only being collected from Federal employees. According to 5 CFR 1320.3, a clearance is needed to collect information from employees of the United States only if the results are to be used for "general statistical purposes, that is, if the results are to be used for statistical compilations of general public interest, including compilations showing the status or implementation of Federal activities and programs."

Reviewer's Name	Title	Date
David Cullison	Agency Clearance Officer	11/5/18

**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:**

Reviewer's Name	Title	Date
Marna B. Dove	Sr. Program Analyst, Electronic Records Manager	11/19/18

**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 Novembe 27, 2018  
Anna T. McGowan, Chief  
Information Services Branch  
Governance & Enterprise Management  
Services Division  
Office of the Chief Information Officer

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

<b>TO: Maureen E. Wylie, Chief Financial Officer, Office of the Chief Financial Officer (OCFO)</b>	
Name of System: <b>Human Resources Management System (HRMS)</b>	
Date ISB received PIA for review: <b>October 10, 2018</b>	Date ISB completed PIA review: <b>November 26, 2018</b>
<b>Noted Issues:</b>	
Anna T. McGowan, Chief Information Services Branch Governance & Enterprise Management Services Division Office of the Chief Information Officer	Signature/Date:  <b>/RA/ November 27, 2018</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>	