

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.

Government Retirement & Benefits (GRB) Platform

Date: June 4, 2020

A. GENERAL SYSTEM INFORMATION

1. Provide a detailed description of the system:

GRB is a web-based Software-as-a-Service (SaaS) federal retirement and benefits solution provided to the Nuclear Regulatory Commission (NRC) by Government Retirement & Benefits, Inc. The NRC benefit specialists use GRB to prepare service histories and create retirement estimate reports as well as other related estimate reports. NRC employees use GRB to access and update employee benefits requests.

2. What agency function does it support?

GRB supports the Office of Chief Human Capital Officer (OCHCO) administration of the benefit programs, including the retirement processing.

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

GRB does not contain additional modules, subsystems, or functions beyond its primary function.

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

5 USC Titles 8415 and 8339

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

Calculation of Federal Employees retirement benefit estimates, disability and death benefit estimates, Service Computation Date calculation, Military/Civilian deposit and redeposit requirements, and retirement plan determination.

6. Points of Contact:

Project Manager	Office/Division/Branch	Telephone
Sandra Labissiere	OCHCO/ADHROP/WMBB	301-287-0551
Business Project Manager	Office/Division/Branch	Telephone
Susan Salter	OCHCO/ADHROP	301-287-0545
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
ISSO	Office/Division/Branch	Telephone
Natalya Bobryakova	OCIO/ITSDOD/SOB/IAT	301-287-0671

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

b. **If modifying or making other updates to an existing system, has a PIA been prepared before?**

Yes.

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

January 23, 2018; ML17355A478

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

- Expanded utilization of GRB Suite’s web-based tools. Functionality now includes the implementation of GRB’s Transaction Module to import payroll data from the NRC’s Federal Personnel Payroll System (FPPS) hosted by the

Department of the Interior's (DOI) Interior Business Center (IBC).

- Updated Points of Contact.
- System user base has expanded to include all NRC employees. NRC employees can now access their own records and update their benefits requests.
- The system will now leverage the NRC's Identity, Credential, and Access Management (ICAM) Authentication Gateway for secure Single-Sign-On user access.

8. Do you have an NRC system Enterprise Architecture (EA)/Inventory number?

Yes

a. If yes, please provide Enterprise Architecture (EA)/Inventory number.

20120006

b. If, no, please contact [EA Service Desk](#) to get Enterprise Architecture (EA)/Inventory number.

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 (provide description for general public (non-licensee workers, applicants before they are licenses etc.)).**

Federal employees and, if applicable, spouses, dependents, and designated beneficiaries of Federal employees.

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

b. What information is being maintained in the system about an individual (be specific – e.g. SSN, Place of Birth, Name, Address)?

Information about Federal employees: name, Social Security Number (SSN), date of birth, marital status, gender, spouse's name, spouse's social security number, spouse's date of birth, spouse's gender, number of dependent children, address, telephone numbers, email addresses, banking information, salary, retirement benefits, and military service.

Information about spouses, dependents, and designated beneficiaries of a Federal employee, if applicable: name, SSN, date of birth, banking information for direct deposit.

c. Is information being collected from the subject individual?

Yes.

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

Information collected from Federal employees: name, SSN, date of birth, marital status, gender, spouse's name, spouse's social security number, spouse's gender, number of dependent children, address, telephone numbers, email addresses, banking information for direct deposit, military service.

Benefits information collected (in the *Application for Death Benefits* for example) include applicant's name, SSN, date of birth, banking information for direct deposit; spouse's (including former spouses) name; dependent child's name, SSN, and date of birth.

d. Will the information be collected from individuals who are not Federal employees?

Yes. Benefits information (within the *Application for Death Benefits, the OPM Standard Form 3104A*) is collected from individuals who are not Federal employees.

(1) If yes, does the information collection have OMB approval?

Yes

(a) If yes, indicate the OMB approval number:

OMB number 3206-0172

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 is imported from FPPS operated by DOI/IBC.

- 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?**

Employees and benefits specialists verify the information for accuracy and completeness.

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

GRB is populated with information entered directly by employees and via electronic file transfer from FPPS.

In the event of a death in service, the benefit specialist collects information from the survivors and then manually enters the information in GRB in order to retrieve the applicable death benefit calculation and forms.

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.**

Not applicable.

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.

Calculation of Federal Employees retirement benefit estimate, death benefit estimate, Service Computation Date calculation, deposit, and redeposit requirements, and retirement plan determination.

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?

Proper use of GRB will be ensured by OCHCO Professionals and System Administrators.

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?

GRB-Saas_RBS Data Dictionary located on the OCHCO G Drive Restricted Access for OCHCO only.

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

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).

Yes. GRB does create and/or aggregate new data about the individual and dependents in order to calculate retirement benefits and dates.

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

Data is housed in the GRB system.

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

The data is verified by HR specialists and employees.

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

Role-based access controls are implemented during the initial user account setup, limiting user access and privilege based on their respective roles. Access to the system is only granted once users have been authenticated through ICAM services, preventing unauthorized access to and use of the data.

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

Data will be retrieved from the system via the Employee's Name.

- a. **If yes, explain, and list the identifiers that will be used to retrieve information on the individual.**

Data will be retrieved from the system via the Employee's Name.

7. **Has a Privacy Act System of Records Notice (SORN) been published in the Federal Register?**

Yes

- a. **If "Yes," provide name of SORN and location in the Federal Register.**

Government-wide SORN - OPM-GOVT-1, General Personnel Records

8. **If the information system is being modified, will the SORN(s) require amendment or revision?**

No.

9. **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?**

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

- Retirement benefit estimate reports

- Death benefit estimate reports
- Service Computation Date reports
- Military/Civilian deposit and redeposit reports

a. What are the reports used for?

Estimating Federal Employee retirement benefits and retirement contributions owed.

b. Who has access to these reports?

Universal access is limited to HR Specialists, managers, and System Administrators. Additionally, NRC employees may generate and access reports that contain only their own information.

D. ACCESS TO DATA

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

NRC OCHCO Professionals and/or Contractor access and administer all-employee data.

All NRC employees may access the system to review their own data.

(1) For what purpose?

NRC OCHCO Professionals and/or Contractors provide estimated retirement benefits reports to NRC Employees.

Individual NRC employees may generate retirement benefits reports for themselves.

(2) Will access be limited?

Yes, universal access is limited to NRC Benefits Specialists and System Administrators.

User-specific access is limited to one's-own data.

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?

Yes.

(1) If yes, who?

Government Retirement & Benefits, Inc. (GRB)

(2) Will access be limited?

Access will be limited to NRC users and individuals providing technical assistance at GRB, Inc.

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

NRC users can access GRB to update and verify their own records and benefits requests.

Individuals providing technical assistance at Government & Retirement Benefits, Inc. can access NRC data within the system to facilitate the resolution of technical issues and ensure the platforms functionality.

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

NRC users access GRB's application online (<https://platform.grbinc.com/>) through a secure internet connection.

E. RECORDS AND INFORMATION MANAGEMENT (RIM) - 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 NARA statutes (44 U.S.C., 36 CFR). Under 36 CFR 1234.10, agencies are required to establish procedures for addressing records management requirements, including recordkeeping requirements and disposition, before approving new electronic information systems or enhancements to existing systems. The following question is intended to determine whether the records and data/information in the system have approved records retention schedule and disposition instructions, whether the system incorporates Records and Information Management (RIM) and NARA's Universal Electronic Records Management (ERM) requirements, and if a strategy is needed to ensure compliance.

- 1) **Can you map this system to an applicable retention schedule in [NRC's Comprehensive Records Disposition Schedule\(NUREG-0910\)](#), or NARA's [General Records Schedules](#)?**

Yes.

- a. **If yes, please cite the schedule number, approved disposition, and describe how this is accomplished (then move to F.1).**

GRS 2.5, item 020: Individual employee separation files.

It includes records not included in separating employee's OPF, documenting individual employees' transfer to another Federal agency of office or voluntary, involuntary, disability, early retirement, or death separation from career, temporary, and political appointment service; and legal and financial obligations of government to employee to government.

Retention is Temporary:

Destroy 1 year after date of separation or transfer, but longer retention is authorized if required for business use.

- b. **If the answer to question E.1 is yes, skip to F. If no, please contact the [Records and Information Management \(RIM\)](#) staff at ITIMPolicy.Resource@nrc.gov.**

F. TECHNICAL ACCESS AND SECURITY

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

Role-based access is limited through use of Agency ICAM authentication services and makes use of NRC-specific account, passwords, and multi-factor authentication. Only users whose official duties require universal-record access are so assigned.

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

Role assignment and ICAM authentication services controls will be utilized to prevent unauthorized access to the system.

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

Yes.

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

Documentation related to access has been provided by GRB and is stored on the G Drive with limited access for OCHCO only.

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?

GRB is hosted off-site by the external service provider GRB, Inc. and made available over the internet. Only NRC users will have access and must authenticate via ITI ICAM services.

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

The *OCHCO Professionals* and *System Administrators* groups access the universal system. Members of NRC's *All Employees* group can access their own records.

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

Yes.

a. If yes, what will be collected?

Access to the system will be logged and collecting the following event data types:

- User logon/logoff Account
- Management Object
- Access
- Policy Change
- Privilege Use Process
- Tracking System
- Events
- Information:
- Date/Time
- Component Event
- Type
- User or Process ID Success or Failure Result

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

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.*

Yes. GRB, Inc. administrators will be involved in the troubleshooting of system related issues.

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

Audit records are reviewed weekly for suspicious activity and violations and findings are reported to the Chief Information Officer (CIO) or assignee. Violations cause alert messages to be sent to Administrators. Audit review will be increased during time of high risk.

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

Yes.

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

GRB is listed in the OCHCO ES Authorization to Operate and has been authorized by NRC as of December 20, 2018 (ML18354A944).

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

System Name: Government Retirement & Benefits (GRB) Platform

Submitting Office: OCHCO

A. PRIVACY ACT APPLICABILITY REVIEW

Privacy Act is not applicable.

Privacy Act is applicable.

Comments:

The information is covered by government-wide system of records notice - OPM GOVT-1 - General Personnel Records.

Reviewer's Name	Title	Date
Sally A. Hardy	Privacy Officer	07/17/2020

B. INFORMATION COLLECTION APPLICABILITY DETERMINATION

No OMB clearance is needed.

OMB clearance is needed.

Currently has OMB Clearance. Clearance No. OMB number 3206-0172

Comments:

Reviewer's Name	Title	Date
David Cullison	Agency Clearance Officer	07/20/20

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	6/22/2020

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/_____
Clarissa L. Evans Brown, Chief
Computer Security Branch
Governance & Enterprise Management
Services Division
Office of the Chief Information Officer

Date September 14, 2020

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

TO: Miriam Cohen, OCHCO	
Name of System: Government Retirement & Benefits (GRB) Platform	
Date CSB received PIA for review: June 7, 2020	Date CSB completed PIA review: July 20, 2020
Noted Issues:	
Clarissa L. Evans Brown, Chief Computer Security Branch Governance & Enterprise Management Services Division Office of the Chief Information Officer	Signature/Date: /RA/ September 14, 2020
<i>Copies of this PIA will be provided to:</i> <i>Tom Ashley, Director IT Services Development & Operation Division Office of the Chief Information Officer</i> <i>Jonathan Feibus Chief Information Security Officer (CISO) Governance & Enterprise Management Services Division Office of the Chief Information Officer</i>	