

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.

Electronic Official Personnel Folder (eOPF)

Date: October 20, 2020

A. GENERAL SYSTEM INFORMATION

- 1. Provide a detailed description of the system:** *(Use plain language, no technical terms.)*

The Electronic Official Personnel Folder (eOPF) system is owned by the Office of Personnel Management (OPM) Office of the Chief Information Officer Federal Data Solutions Data Warehouse Program and it resides in the OPM Macon Data Center. eOPF is an e-Government initiative developed by OPM for all Executive Branch federal agencies to manage and administer the official personnel files and to provide 24/7 access to personnel information for Human Resources (HR) staff, managers, and employees.

Each Federal employee is able to access their individual Official Personnel Folder (OPF) in eOPF which documents their entire period of Federal civilian service. The eOPF system maintains the electronic versions of the OPF for Federal employees and contains various official personnel files and human resource records used by the HR office. The U.S. Nuclear Regulatory Commission (NRC) representatives manage the NRC's users and data retention. System data access and information sharing is role-based.

- 2. What agency function does it support?** *(How will this support the U.S. Nuclear Regulatory Commission's (NRC's) mission, which strategic goal?)*

The eOPF system supports the management of official personnel files.

- 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? *(What law, regulation, or Executive Order authorizes the collection and maintenance of the information necessary to meet an official program mission or goal? NRC internal policy is not a legal authority.)*

5 Code of Federation Regulations (CFR) 293.302 created the OPF to house paper records used by Federal government HR offices. These records establish an employment history that includes grades, occupations and pay, and records choices under Federal benefits programs and were maintained as paper in agency HR offices until they were converted to digital images as part of an e-Government initiative established in response to the E-Government Act of 2002.

In general, OPM collects and maintains the information in eOPF pursuant to 5 United States Code (U.S.C.) §§ 1104, 1302, 2951, 3301, and 4315; E.O. 12107 (December 28, 1978), 3 CFR 1954-1958 Comp.; 5 U.S.C. 1104, and 1302; 5 CFR 7.2; Executive Orders 9830 and 12107; 3 CFR 1943-1948 Comp.; and 5 U.S.C. 2951(2) and 3301 authorize the maintenance of records the Government needs to make accurate employment decisions throughout an employee's career. 5 CFR Chapter 1 Part 293 Personnel Records.

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

The data will be used by HR personnel for human resource functions.

6. Points of Contact: *(Do not adjust or change table fields. Annotate N/A if unknown. If multiple individuals need to be added in a certain field, please add lines where necessary.)*

Project Manager	Office/Division/Branch	Telephone
Brendan Cain	OCHCO/H CAB	301-287-0552
Business Project Manager	Office/Division/Branch	Telephone
N/A	N/A	N/A
Technical Project Manager	Office/Division/Branch	Telephone
Brendan Cain	OCHCO/H CAB	301-287-0552
Executive Sponsor	Office/Division/Branch	Telephone
Mary Lamary	OCHCO	301-415-3300

ISSO	Office/Division/Branch	Telephone
Natalya Bobryakova	OCIO/GEMSD/CSB/IAT	301-287-0671
System Owner/User	Office/Division/Branch	Telephone
Mary Lamary	OCHCO	301-415-3300

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 the Agencywide Documents Access and Management System (ADAMS) accession number.

A PIA was approved on March 15, 2018, Main Library (ML) ML18075A265.

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

Updated the System Description, Points of Contact information, and added clarification to A.2, B.1.g, C.1, and updated F.9.

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

Yes.

a. If yes, please provide the EA/Inventory number.

eOPF is a component of the NRC's Third-Party System – OCHCO External Services (TPS-OES) subsystem. The TPS EA number is 20180002.

b. If no, please contact [EA Service Desk](#) to get the 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.)).

Current and former NRC 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. Social Security Number (SSN), Place of Birth, Name, Address)?

HR data included in eOPF includes notification of personnel action (SF-50) and documents supporting the action taken; life insurance, thrift savings plan, health benefits and related beneficiary forms; letters of disciplinary action; notices of reductions-in-force; and other records retained in accordance with the OPM's Guide to Personnel Recordkeeping.

Records include employment information such as personal qualification statements, resumes, and related documents including information about an individual's birth date, SSN, veterans preference status, tenure, minority group designator, physical handicaps, past and present salaries, grades, position titles; employee locator information identifying home and work address, phone numbers, and emergency contacts; and certain medical records related to initial appointment and employment.

c. Is information being collected from the subject individual? (*To the greatest extent possible, collect information about an individual directly from the individual.*)

Records maintained in eOPF are collected from the individual and from HR professionals.

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

Individuals provide resumes, birth date, SSN, veteran preference status, tenure, minority group designator, physical handicaps, past and present salaries, grades, and position titles.

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

No.

(1) If yes, does the information collection have the Office of Management and Budget's (OMB) approval?

N/A.

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

N/A.

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.

eOPF collects existing Official Personnel Folder (OPF) records.

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?

eOPF collects information from the Federal Personnel Payroll System (FPPS).

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

Employees have access to their records to verify that they are relevant, timely, or complete in accordance with the Privacy Act. Employees can request an amendment, correction, or deletion of their records when the records are inaccurate.

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

Information will be collected from forms completed by the employee. Existing paper OPF records will be scanned into the eOPF by OPM contractors.

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).

N/A.

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

N/A.

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.

- Making a decision when an NRC employee or former NRC employee questions the validity of a specific document in an individual's record;
- Upon transfer of an employee to another Federal agency, the information is transferred to such agency;
- Store and query all personnel actions and related documentation;
- OPM investigations;
- Office of the Inspector General (OIG) investigations;
- Security investigations;
- Determine eligibility for Federal benefits;
- Employment verification;
- Update monthly Enterprise Human Resources Integration data repository;

- Provide statistical reports to Congress, agencies, and the public on characteristics of the Federal work force;
- Review, audit, or reporting purposes by OPM and/or Merit Systems Protection Board;
- Provide members of the public with the names, position titles, grades, salaries, appointments (temporary or permanent), and duty stations of employees; and
- Provide information to the Public Health Service in connection with Health Maintenance Examinations and to other Federal agencies responsible for Federal benefit programs administered by the Department of Labor (Office of Workers Compensation Programs) and the OPM.

1. Is the use of the data both relevant and necessary for the purpose for which the system is designed?

Yes.

2. Who will ensure the proper use of the data in this system?

HR Professionals and System Administrators.

3. 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?

The data model can be found in the United States Office of Personnel Management Human Resources Line of Business Data Model Version 1: https://www.opm.gov/services-for-agencies/hr-line-of-business/enterprise-architecture/hrlob_dm.pdf.

4. 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?**

N/A.

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

N/A.

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

N/A.

5. **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.)**

Yes.

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

Records are retrieved by name and/or SSN.

6. **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.**

OPM/GOVT-1 SORN – General Personnel Records has been published in the Federal Register.

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

No.

8. **Will this system provide the capability to identify, locate, and monitor (e.g., track, observe) individuals?**

No.

a. **If yes, explain.**

N/A.

(1) **What controls will be used to prevent unauthorized monitoring?**

N/A.

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

- Active Documents – Created by HR Professionals
- Active Documents – Modifications
- Active Documents – Viewed
- Documents Moved to Deleted Folder
- Purged Documents – All Actions
- Purged Documents
- Inactive User
- New Employee
- eOPF Additional Access
- eOPF Roles
- eOPF User Information

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

Active Documents - Created by HR Professionals: Allows the user to produce a report for either a specific individual's folder or to look at "create actions" performed by specific individuals that may span multiple folders. Using the "Filter by Viewer SSN," option you are looking for all actions performed by that individual.

Active Documents - Modifications: Allows the user to produce a report for either a specific individual's folder or to look at modification actions performed by a specific individual that may span multiple folders.

Active Documents - Viewed: Allows the user to produce a report for either a specific individual's folder or to look at "view actions" performed by a specific individual that may span multiple folders.

Documents Moved to Deleted Folder: Allows the user to produce a report for either a specific individual's folder or to look at "documents moved" actions performed by specific individuals that may span multiple folders.

Purged Documents - All Actions: Allows the user to produce a report for either a specific individual's folder "purged documents activities" or to look at all "purged documents activities" performed by specific individuals that may span multiple folders.

Purged Documents: Allows the user to produce a report for either a specific individual's folder for purged documents or to look at purged document action performed by specific individuals that may span multiple folders.

Inactive User: Lists the employee accounts that have been inactivated by the employee feed provided to eOPF. The report displays the employee's current eOPF folder status. NOTE: The employee feed is configured to allow a time frame to occur between receipt of an employee 'Inactive' status and the time the employee account is disabled.

New Employee: Lists the eOPF accounts that have a folder and that have been created within a specified range of time. The following report uses the create date of the folder associated to the user account to determine if it falls within the specified date range.

eOPF Additional Access: Displays the user's additional access rights in the eOPF system.

eOPF Roles: Lists the user's Group membership(s) and Role in eOPF system.

eOPF User Information: Lists the user account information.

b. Who has access to these reports?

Access to reports is role based assigned by the HR System Administrator. The administrator can create a group to assign report access to; for example, access could be granted to all HR Professionals, or to just a special group of HR Professionals.

D. ACCESS TO DATA

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

Office of the Chief Human Capital Officer (OCHCO), regional HR staffs, and the OIG have access to the data.

(1) For what purpose?

To maintain employee personnel records.

(2) Will access be limited?

Yes, access will be limited to NRC HR professionals.

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).

N/A.

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

N/A.

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

Yes.

(1) If yes, who?

OPM is the system owner and the data is hosted in the OPM data center.

(2) Will access be limited?

Yes, access will be limited through use of user logins and passwords or Personal Identity Verification (PIV)/Personal Identification Number (PIN), and role assignments.

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

OPM is authorized access to all Federal OPF records.

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

Data can be transmitted from FPPS to the eOPF server using Connect: Direct or Connect: Direct Secure + Option.

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 United States Code (U.S.C.), 36 Code of Federation Regulations (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 and NARA's Universal Electronic Records Management 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 \(GRS\)](#)?**

Yes.

Guidance for retentions comes from the [Office of Personnel Management's The Guide to Personnel Recordkeeping](#), [OPM/GOVT-1 SORN](#) and [NARA's GRS 2.2 – Employee Management Records](#) and [GRS 5.2 – Transitory and Intermediary Records](#).

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

- **For example, will the records or a composite thereof be deleted once they reach their approved retention or exported to an approved file format for transfer to the National Archives based on their approved disposition?**

See Chapter 7 of [The Guide to Personnel Recordkeeping](#) for guidance for processing personnel records for:

- Transferring eOPF
 - Serviced by a different personnel office the same agency;
 - In another agency when both offices transfer personnel and medical folders; and
 - In an agency that does not transfer personnel and medical folders.
- Transferring Records to the National Personnel Records Center (NPRC) under normal circumstances, the eOPF is transferred to NPRC 90 days after separation from Federal service.

GRS 2.2 Item 040 Official Personnel Folder (Long Term Records):
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.

GRS 2.2 Item 041 Official Personnel Folder (Short Term Records):
Destroy when superseded or obsolete, or upon separation or transfer of employee, whichever is earlier.

GRS 5.2 Item 020 Enterprise Human Resource Integration: Destroy upon verification of successful creation of the final document or file, or when no longer needed for business use, whichever is later. *(Hardcopy original personnel folders scanned into the Enterprise Human Resource Integration eOPF Database are covered by this item).*

- b. If no, please contact the [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).**

Access is limited through the use of user logins and passwords or PIV card and PIN. Employees can only view their own information. HR System administrators implement and maintain user access for HR staff and investigators.

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

There are reports available for monitoring use of the system by each agency. Additional reports can be generated if needed.

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

Yes.

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

The eOPF Solution System Design Document available by request.

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

No. eOPF is a web-based solution operated by OPM. NRC users access eOPF via the Internet through the NRC network.

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

N/A.

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

Users of NRC records (HR Professionals, employees, supervisors) and system administrators (NRC, OPM).

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

Yes.

a. If yes, what will be collected?

All activities performed are tracked; for example, adding a document, deleting a document, or creating an employee OPF. Anytime an employee OPF is accessed, the system tracks each document that was viewed and the reason why the document was viewed.

6. 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 Personally Identifiable Information (PII) contract clauses are inserted in their contracts.

- *Federal Acquisition Regulation (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.*

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

There are reports available for monitoring use of the system by each agency. Additional reports can be generated if needed.

8. Is the data secured in accordance with the Federal Information Security Management Act (FISMA) requirements?

Yes.

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

The OPM issued a continued 3-year Authority to Operate (ATO) for eOPF on July 8, 2019.

NRC issued an ongoing ATO for the TPS-OES subsystem on December 20, 2018, (ADAMS accession number ML18354A944).

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

System Name: Electronic Official Personnel Folder (eOPF)

Submitting Office: Office of the Chief Information Officer (OCIO)

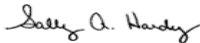
A. PRIVACY ACT APPLICABILITY REVIEW

Privacy Act is not applicable.

Privacy Act is applicable.

Comments:

e-OPF records are covered by the government-wide system of records notice - OPM/GOVT-1 General Personal Records. E-OPF does not collect or maintain any PII on members of the public, only on current and former federal employees.

Reviewer's Name	Title
 Signed by Hardy, Sally on 12/08/20	Privacy Officer


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
 Signed by Cullison, David on 12/04/20	Agency Clearance Officer

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.

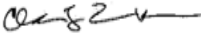
Comments:

Reviewer's Name	Title
 Signed by Dove, Marna on 12/08/20	Sr. Program Analyst, Electronic Records Manager

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:

 Signed by Brown, Cris on 12/10/20

Chief
Cyber Security Branch
Governance and Enterprise Management
Services Division
Office of the Chief Information Officer

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

TO: Mary A. Lamary, Office of the Chief Human Capital Officer (OCHCO)

Name of System: Electronic Official Personnel Folder (eOPF)

Date CSB received PIA for review:

November 18, 2020

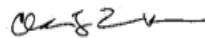
Date CSB completed PIA review:

December 08, 2020

Noted Issues:

Chief
Cyber Security Branch
Governance and Enterprise Management
Services Division
Office of the Chief Information Officer

Signature/Date:



Signed by Brown, Cris
on 12/10/20

Copies of this PIA will be provided to:

*Thomas G. Ashley, Jr.
Director
IT Services Development and Operations Division
Office of the Chief Information Officer*

*Jonathan R. Feibus
Chief Information Security Officer (CISO)
Office of the Chief Information Officer*