
U.S. Nuclear Regulatory Commission



**Privacy Impact Assessment
Employees' Compensation Operation and
Management Portal (ECOMP)**

Office of the Chief Information Officer (OCIO)

**Version 1.0
10/17/2023**

Employees' Compensation Operation and Management Portal (ECOMP)	Version 1.0
Privacy Impact Assessment	10/17/2023

Document Revision History

Date	Version	PIA Name/Description	Author
10/17/2023	1.0	ECOMP- Initial Release	OCIO / OCHCO Oasis Systems, LLC
09/26/2023	Draft	ECOMP- Draft Release	OCIO / OCHCO Oasis Systems, LLC

Employees' Compensation Operation and Management Portal (ECOMP)	Version 1.0
Privacy Impact Assessment	10/17/2023

Table of Contents

1	Description	1
2	Authorities and Other Requirements	2
3	Characterization of the Information	6
4	Data Security	8
5	Privacy Act Determination	11
6	Records and Information Management-Retention and Disposal	12
7	Paperwork Reduction Act	14
8	Privacy Act Determination	15
9	OMB Clearance Determination	16
10	Records Retention and Disposal Schedule Determination	17
11	Branch Chief Review and Concurrence	18

Employees' Compensation Operation and Management Portal (ECOMP)	Version 1.0
Privacy Impact Assessment	10/17/2023

The agency is subject to the requirements of the E-Government Act and is committed to identifying and addressing privacy risks whenever it develops or makes changes to its information systems. The questions below help determine any privacy risks related to the E-Government Act or later guidance by the Office of Management and Budget (OMB) and the National Institute of Standards and Technology (NIST).

Name/System/Subsystem/Service Name: Employees' Compensation Operation and Management Portal (ECOMP).

Data Storage Location (i.e., Database Server, SharePoint, Cloud, Other Government Agency, Power Platform) Other Federal Government Agency, U.S. Department of Labor (DOL).

Date Submitted for review/approval: October 24, 2023.

1 Description

1.1 Provide the description of the system/subsystem, technology (i.e., Microsoft Products), program, or other data collections (hereinafter referred to as "project"). Explain the reason the project is being created.

The Employees' Compensation Operations and Management Portal (ECOMP) is a web-based application owned and operated by the U.S. Department of Labor (DOL) Office of Workers' Compensation Programs (OWCP) Division of Federal Employees' Compensation (DFEC). ECOMP is a sub-component of the Integrated Federal Employees' Compensation System (iFECS) owned and operated by DOL/OWCP/DFEC. iFECS supports DFEC's core business functions for administering the Federal Employees' Compensation Act (FECA).

ECOMP provides Federal agencies and employees with an electronic system for recording work-related injuries and illnesses as well as processing claims under FECA. ECOMP has no purpose outside of providing a portal into iFECS, a case management system, for claimants and certain Federal agency benefit representatives. ECOMP can be accessed via the internet at the following url: <https://www.ecomp.dol.gov>. The U.S. Nuclear Regulatory Commission (NRC) uses ECOMP to manage Federal workers' compensation claims.

Please mark appropriate response below if your project/system will involve the following:

<input type="checkbox"/> PowerApps	<input type="checkbox"/> Public Website
<input type="checkbox"/> Dashboard	<input type="checkbox"/> Internal Website
<input type="checkbox"/> SharePoint	<input type="checkbox"/> None
<input checked="" type="checkbox"/> Other: Web-application owned and operated by DOL	

Employees' Compensation Operation and Management Portal (ECOMP)	Version 1.0
Privacy Impact Assessment	10/17/2023

1.2 Does this privacy impact assessment (PIA) support a proposed new project, proposed modification to an existing project, or other situation? Select options that best apply in table below.

Mark appropriate response.

Status Options	
<input type="checkbox"/>	New system/project
<input type="checkbox"/>	Modification to an existing system/project. <i>If modifying or making other updates to an existing system/project, provide the ADAMS ML of the existing PIA and describe the modification.</i>
<input checked="" type="checkbox"/>	Annual Review <i>If making minor edits to an existing system/project, briefly describe the changes below.</i> The PIA has been transferred into the latest template
<input type="checkbox"/>	Other (explain)

1.3 Points of Contact:

	Project Manager	System Owner/Data Owner /Steward	ISSO	Business Project Manager	Technical Project Manager	Executive Sponsor
Name	John Shea	Mary Lamary	Natalya Bobryakova	Karen Cobbs	Brendan Cain	Mary Lamary
Office /Division /Branch	Office of the Chief Human Capital Officer (OCHCO) /Human Capital Analysis Branch (HCAB)	Office of the Chief Human Capital Officer (OCHCO)	Office of the Chief Information Officer (OCIO) /Cyber and Infrastructure Security Division (CISD)	Office of the Chief Human Capital Officer (OCHCO) /Associate Director for HR Operations and Policy (ADHROP) /Workforce Management & Benefits Branch (WMBB)	Office of the Chief Human Capital Officer (OCHCO) /Human Capital Analysis Branch (HCAB)	Office of the Chief Human Capital Officer (OCHCO)
Telephone	301-415-0246	301-415-3300	301-287-0671	N/A	301-287-0552	301-415-3300

2 Authorities and Other Requirements

2.1 What specific legal authorities and/or agreements permit the collection of information for the project?

Provide all statutory and regulatory authorities for operating the project, including the authority

Employees' Compensation Operation and Management Portal (ECOMP)	Version 1.0
Privacy Impact Assessment	10/17/2023

to collect the information; NRC internal policy is not a legal authority. Please mark appropriate response in table below.

Mark with an "X" on all that apply.	Authority	Citation/Reference
<input checked="" type="checkbox"/>	Statute	STATUTORY AND REGULATORY PROVISIONS: FECA claim file information is covered by the Privacy Act of 1974, see 5 U.S.C. 552a. The FECA regulations at 20 C.F.R. §10.11 provide in part that "All records relating to claims for benefits filed under the FECA, including any copies of such records maintained by an employing agency, are covered by the government-wide Privacy Act system of records entitled DOL/GOVT-1 (Office of Workers' Compensation Programs, Federal Employees' Compensation Act File). This system of records is maintained by and under the control of the OWCP, and, as such, all records covered by DOL/GOVT-1 are official records of the OWCP." DOL/GOVT-1 provides that Federal agencies that employed the claimant at the time of the occurrence or recurrence of the injury or occupational illness can access OWCP case file information in order to verify billing, to assist in administering the FECA, to answer questions about the status of the claim, to consider rehire, retention or other actions the agency may be required to take with regard to the claim, or to permit the agency to evaluate its safety and health program, 77 FR 1728, at 1738- 41 (January 11, 2012), viewable at http://www.gpo.gov/fdsys/pkg/FR-2012-01-11/pdf/2012-345.pdf
<input type="checkbox"/>	Executive Order	
<input checked="" type="checkbox"/>	Federal Regulation	DOL administers and enforces more than 180 Federal laws. The mandates and the regulations that implement them cover many workplace activities for about 10 million employers and 125 million workers. The Federal Employees' Compensation Act (FECA) , 5 United States Code

Employees' Compensation Operation and Management Portal (ECOMP)	Version 1.0
Privacy Impact Assessment	10/17/2023

Mark with an "X" on all that apply.	Authority	Citation/Reference
		<p>(U.S.C.) 8101 et seq., establishes a comprehensive and exclusive workers' compensation program which pays compensation for the disability or death of a Federal employee resulting from personal injury sustained while in the performance of duty. The FECA, administered by OWCP, provides benefits for wage loss compensation for total or partial disability, schedules awards for permanent loss or loss of use of specified members of the body, related medical costs, and vocational rehabilitation.</p> <p>The Longshore and Harbor Workers' Compensation Act, administered by the OWCP, provides for compensation and medical care to certain maritime employees (including a longshore worker or other person in longshore operations, and any harbor worker, including a ship repairer, shipbuilder, and shipbreaker) and to qualified dependent survivors of such employees who are disabled or die due to injuries that occur on the navigable waters of the United States, or in adjoining areas customarily used in loading, unloading, repairing or building a vessel.</p> <p>The Energy Employees Occupational Illness Compensation Program Act is a compensation program that provides a lump-sum payment of \$150,000 and prospective medical benefits to employees (or certain of their survivors) of the Department of Energy and its contractors and subcontractors as a result of cancer caused by exposure to radiation, or certain illnesses caused by exposure to beryllium or silica incurred in the performance of duty, as well as for payment of a lump-sum of \$50,000 and prospective medical benefits to individuals (or certain of their survivors) determined by the Department of Justice to be eligible for compensation as uranium workers under section 5 of the</p>

Employees' Compensation Operation and Management Portal (ECOMP)	Version 1.0
Privacy Impact Assessment	10/17/2023

Mark with an "X" on all that apply.	Authority	Citation/Reference
		<p>Radiation Exposure Compensation Act.</p> <p>The Black Lung Benefits Act provides monthly cash payments and medical benefits to coal miners totally disabled from pneumoconiosis ("black lung disease") arising from their employment in the nation's coal mines. The statute also provides monthly benefits to a deceased miner's survivors if the miner's death was due to black lung disease.</p>
<input checked="" type="checkbox"/>	Memorandum of Understanding/Agreement	ML21154A230
<input type="checkbox"/>	Other (summarize and provide a copy of relevant portion)	

2.2 Explain how the information will be used under the authority listed above (i.e., *enroll employees in a subsidies program to provide subsidy payment*).

- Each time an Agency Reviewer (AR) accesses a case, he/she receives a Privacy Act warning consistent with DOL/GOVT-1, which is referenced above.
- Access to this case file and data must be restricted to only those authorized employees who need it to perform their official duties, and confidentiality of the records should be protected in such a way that unauthorized persons do not have access to any such records.
- Case documentation and data contained in this system are and remain U.S. DOL data that is subject to the Privacy Act (5 U.S.C. 552a) and to the Systems Notice for DOL/GOVT-1. Absent a court order from a court of competent jurisdiction or a written release from the individual FECA claimant, such data may only be used pursuant to DOL's OWCP interpretation of a routine use published in DOL/GOVT-1 and in a manner that is compatible with the purpose for which the record was created. That purpose is the administration and payment of FECA compensation. Before any data from DOL/GOVT-1 can be used in a personnel or similar action, there must be a written release from the claimant or an order from a court of competent jurisdiction, or agreement by DFEC management that disclosure of the information is permitted under the Privacy Act. For further information see <http://www.dol.gov/sol/privacy/dol-govt-1.htm>.
- By proceeding with the retrieval of the case after having received such warning, the AR is certifying that he/she is accessing the case file information for a reason consistent with a published routine use.

Employees' Compensation Operation and Management Portal (ECOMP)	Version 1.0
Privacy Impact Assessment	10/17/2023

If the project collects Social Security numbers, state why this is necessary and how it will be used.

SSN numbers are necessary to process medical and compensation claims.

3 Characterization of the Information

In the table below, mark the categories of individuals for whom information is collected.

Category of individual	
<input checked="" type="checkbox"/>	Federal employees
<input type="checkbox"/>	Contractors
<input type="checkbox"/>	Members of the Public (any individual other than a Federal employee, consultant, or contractor)
<input type="checkbox"/>	Licensees
<input type="checkbox"/>	Other

In the table below, is a list of the most common types of PII collected. Mark all PII that is collected and stored by the project/system. If there is additional PII not defined in the table below, a comprehensive listing of PII is provided for further reference in ADAMS at the following link: [PII Reference Table 2023](#).

Categories of Information			
<input checked="" type="checkbox"/>	Name	<input type="checkbox"/>	Resume or curriculum vitae
<input checked="" type="checkbox"/>	Date of Birth	<input type="checkbox"/>	Driver's License Number
<input type="checkbox"/>	Country of Birth	<input type="checkbox"/>	License Plate Number
<input type="checkbox"/>	Citizenship	<input type="checkbox"/>	Passport number
<input type="checkbox"/>	Nationality	<input type="checkbox"/>	Relatives Information
<input type="checkbox"/>	Race	<input type="checkbox"/>	Taxpayer Identification Number
<input checked="" type="checkbox"/>	Home Address	<input checked="" type="checkbox"/>	Credit/Debit Card Number
<input checked="" type="checkbox"/>	Social Security number (Truncated or Partial)	<input checked="" type="checkbox"/>	Medical/health information
<input type="checkbox"/>	Gender	<input type="checkbox"/>	Alien Registration Number
<input type="checkbox"/>	Ethnicity	<input type="checkbox"/>	Professional/personal references
<input type="checkbox"/>	Spouse Information	<input type="checkbox"/>	Criminal History
<input type="checkbox"/>	Personal e-mail address	<input type="checkbox"/>	Biometric identifiers (facial images, fingerprints, iris scans)
<input checked="" type="checkbox"/>	Personal Bank Account Number	<input type="checkbox"/>	Emergency contact e.g., a third party to contact in case of an emergency
<input checked="" type="checkbox"/>	Personal Mobile Number	<input type="checkbox"/>	Accommodation/disabilities information
<input checked="" type="checkbox"/>	Marital Status	<input checked="" type="checkbox"/>	Other Wage/Salary information,

Employees' Compensation Operation and Management Portal (ECOMP)	Version 1.0
Privacy Impact Assessment	10/17/2023

Categories of Information	
<input type="checkbox"/> Children Information	Government benefits data, Employment records and certificates.
<input type="checkbox"/> Mother's Maiden Name	

3.1 Describe how the data is collected for the project. (i.e., NRC Form, survey, questionnaire, existing NRC files/ databases, response to a background check).

The FECA benefit process is initiated when a claimant (Federal employee or dependent) submits a notice of injury, occupational disease, or death to their respective agency of employment.

These claims can be broken into two main areas: (1) medical, which includes disability and death claims, and (2) compensation, which is to reclaim lost wages from injury, disability, or disease.

3.2 If using a form to collect the information, provide the form number, title and/or a link.

- 1240-0007, Form OWCP-915
- 1240-0009, Form CA-2a
- 1240-0013, Form CA-5 and CA-5B
- 1240-0037, Form OWCP-957
- 1240-0046, Forms CA-7, CA-16, and CA-20

3.3 Who provides the information? Is it provided directly from the individual or a third party.

Information is provided directly from the individual and third parties (medical providers or family members of an employee).

3.4 Explain how the accuracy of the data collection is validated. If the project does not check for accuracy, please explain why.

The system puts Electronic Data Interchange (EDI) records through three phases of edit and validation checks before the data is available in iFECS. If the record does not pass those tests, it is rejected, and the agency is notified that the record needs to be corrected and resubmitted. In addition, once a record is received in iFECS, the Case Create Clerk reviews the data before the case number is assigned.

During case development, the Claims Examiner (CE) reviews the accuracy of the information that was entered by the Case Create Clerk or in the EDI file by comparing the claim form to the information in iFECS. If the information is not correct the CE makes the corrections.

Access controls are in place within iFECS to ensure that the CE who monitors the file does not have access to create cases.

The images of the documents received by a medical bill payment contractor are electronically indexed, verified, and quality checked before being transmitted to DOL and to the contractor, or State Healthcare, for adjudication and payment processing.

Employees' Compensation Operation and Management Portal (ECOMP)	Version 1.0
Privacy Impact Assessment	10/17/2023

3.5 Will PII data be used in a test environment? If so, explain the rationale.

No.

3.6 What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?

Claimants can correct inaccurate or erroneous information by contacting the closest OWCP-DFEC office and provide amended information. They are also periodically contacted by DFEC claims administrators to request updated information for their claim.

Individuals are notified at the time they file the claim that they should contact the office should there be any changes in the information provided. DFEC is also in regular communication with the claimant providing the opportunity for correction of information throughout the life of the claim.

4 Data Security

4.1 Describe who has access to the data in the project (i.e., internal NRC, system administrators, external agencies, contractors, public).

The following NRC staff have access to the data:

- OCHCO, Workforce Management and Benefits Branch, Human Resources Specialists
- OCHCO, Operations Branch and Regional Operations Branch, Human Resources Specialists
- OIG, Resource Management and Operations Support, Human Resources Specialist
- ADM, Division of Facilities and Security, OSHA Record Keepers
- Regional DRMA organizations, OSHA Record Keepers

4.2 If the project/system shares information with any other NRC systems, identify the system, what information is being shared and the method of sharing.

N/A.

4.3 If the project/system connects, receives, or shares information with any external non-NRC partners or systems, identify what is being shared.

Electronic case records can be requested by the following DOL organizations outside of OWCP:

- The Office of the Inspector General (OIG) and the Office of the Chief Financial Officer (OCFO) for audit purposes;
- The Office of the Solicitor (SOL) for litigation support.

Identify what agreements are in place with the external non-NRC partner or system in the table below.

Agreement Type	
<input type="checkbox"/>	Contract Provide Contract Number:
<input type="checkbox"/>	License Provide License Information:

Employees' Compensation Operation and Management Portal (ECOMP)	Version 1.0
Privacy Impact Assessment	10/17/2023

<input checked="" type="checkbox"/>	Memorandum of Understanding Provide ADAMS ML number for MOU: MOU between DOL/OWCP/DFEC and NRC/OCHCO, ML21154A230
<input type="checkbox"/>	Other
<input type="checkbox"/>	None

4.4 Describe how the data is accessed and describe the access control mechanisms that prevent misuse.

DOL manages usernames and passwords for ECOMP. Requests are received by email with concurrence or approval by an appropriate manager or supervisor. ECOMP requires a semi-annual review and certification of all HR and OSHA Reviewer accounts.

OWCP uses the concept of least privilege. Access is granted only after authorization based on documented access request policies. Logs for certain system functions are also reviewed on a regular basis to check for any misuse or other issues.

All OWCP operations are required to have security audits and assessments conducted of their operations on an annual basis. All OWCP systems must have system level auditing enabled to provide for reasonable response in the event of a security situation. IT system auditing and security testing are essential aspects of how the agency ensures the integrity and availability of our computing systems. Auditing and assessments also provide the agency the ability to be more effective in preventing security vulnerabilities.

4.5 Explain how the data is transmitted and how confidentiality is protected (i.e., encrypting the communication or by encrypting the information before it is transmitted).

Some information is shared via portable media and, as of April 2008, is encrypted via the DOL mandated encryption software. Additional ways of sharing the information are through secure email or Connect:Direct. The transmission through Connect:Direct includes two factor authentication and encryption of the data.

OWCP has selected the American National Standard Institute Accredited Standards Committee X12 as its electronic messaging standard for all EDI transactions exchanged between DOL and its trading partners to create workers' compensation claims. The X12 Transaction Set 148, Report of Injury, Illness or Incident, version 003070, has been selected by OWCP as the electronic message format used to transmit the CA-1 and CA-2 form. Only EDI files with unique batch IDs, which consist of the trading partner code and date, will be accepted each day. The EDI file, containing the claims captured in 148 transaction sets, is deposited on a secure server through SFTP or Connect:Direct. Each trading partner must submit the EDI file from a designated IP address. This IP address must be validated by the Division of IT Management and Services prior to submission. IP addresses that have not been validated will not be allowed access to the DOL file transfer protocol server.

Connections to the IVR system, AQS/CQS, and ECOMP require authentication before the user can access any information about their own claim(s).

The transmission of data to FMS is through a direct connection which includes two factor authentication and encryption of the data.

Employees' Compensation Operation and Management Portal (ECOMP)	Version 1.0
Privacy Impact Assessment	10/17/2023

4.6 Describe where the data is being stored (i.e., NRC, Cloud, Contractor Site).

DOL hosts and stores ECOMP data in an internal cloud environment located in Ashburn, VA.

4.7 Explain if the project can be accessed or operated at more than one location.

No.

4.8 Can the project be accessed by a contractor? If so, do they possess an NRC badge?

Yes, the project can be accessed by the DOL's contractors. They do not possess an NRC badge.

4.9 Explain the auditing measures and technical safeguards in place to prevent misuse of data.

OWCP uses the concept of least privilege. Access is granted only after authorization based on documented access request policies. Logs for certain system functions are also reviewed on a regular basis to check for any misuse or other issues.

All OWCP operations are required to have security audits and assessments conducted of their operations on an annual basis. All OWCP systems must have system level auditing enabled to provide for reasonable response in the event of a security situation. IT system auditing and security testing are essential aspects of how the agency ensures the integrity and availability of our computing systems. Auditing and assessments also provide the agency the ability to be more effective in preventing security vulnerabilities.

4.10 Describe if the project has the capability to identify, locate, and monitor (i.e., trace/track/observe) individuals.

No.

4.11 Define which FISMA boundary this project is part of.

NRC's ECOMP is a component of the OCIO Third Party System (TPS) OCHCO External Services (OES) Subsystem. NRC issued an Authority to Operate (ATO) for ECOMP on December 20, 2018.

DOL's ECOMP is a sub-component of iFECS. DOL issued an authorization for iFECS on June 19, 2019.

4.12 Is there an Authority to Operate (ATO) associated with this project/system? Authorization Status	
<input type="checkbox"/>	Unknown
<input type="checkbox"/>	No <i>If no, please note that the authorization status must be reported to the Chief Information Security Officer (CISO) and Computer Security Organization (CSO's) Point of Contact (POC) via e-mail quarterly to ensure the authorization remains on track.</i>
<input type="checkbox"/>	In Progress provide the estimated date to receive an ATO. Estimated date:
<input checked="" type="checkbox"/>	Yes

Employees' Compensation Operation and Management Portal (ECOMP)	Version 1.0
Privacy Impact Assessment	10/17/2023

Authority to Operate (ATO) for OCHCO External Services (OES), ML18354A944 Indicate the data impact levels (Low, Moderate, High, Undefined) approved by the Chief Information Security Officer (CISO) Confidentiality-Moderate Integrity- Moderate Availability- Moderate
--

4.13 Provide the NRC system Enterprise Architecture (EA)/Inventory number. If unknown, contact [EA Service Desk](#) to get the EA/Inventory number.

ECOMP is a component of the OCHCO External Services (OES) Subsystem. OES is a subsystem of TPS; EA number is 20180002.

5 Privacy Act Determination

5.4 Is the data collected retrieved by a personal identifier?

Mark the appropriate response.

Response	
<input checked="" type="checkbox"/>	Yes, the PII is retrieved by a personal identifier (i.e., individual's name, address, SSN, etc.)
<input type="checkbox"/>	List the identifiers that will be used to retrieve the information on the individual.
<input type="checkbox"/>	No, the PII is not retrieved by a personal identifier. If no, explain how the data is retrieved from the project.

5.2 For all collections where the information is retrieved by a personal identifier, the Privacy Act requires that the agency publish a System of Record Notice (SORN) in the Federal Register. As per the Privacy Act of 1974, "the term 'system of records' means a group of any records under the control of any agency from which information is retrieved by the name of the individual or by some other personal identifier assigned to the individual.

Mark the appropriate response in the table below.

Response	
<input checked="" type="checkbox"/>	Yes, this system is covered by an existing SORN. (See existing SORNs: https://www.nrc.gov/reading-rm/foia/privacy-systems.html) Provide the SORN name, number, (List all SORNs that apply): Government-wide System of Records Notice OPM/GOVT – General Personal Records and DOL/GOVT-1 Office of Workers' Compensation Programs, Federal Employee's Compensation Act File.
<input type="checkbox"/>	SORN is in progress
<input type="checkbox"/>	SORN needs to be created
<input type="checkbox"/>	Unaware of an existing SORN

Employees' Compensation Operation and Management Portal (ECOMP)	Version 1.0
Privacy Impact Assessment	10/17/2023

<input type="checkbox"/>	No, this system is not a system of records and a SORN is not applicable.
--------------------------	---

5.3 When an individual is asked to provide personal data (i.e., form, webpage, survey), is a Privacy Act Statement (PAS) provided?

A Privacy Act Statement is a disclosure statement required to appear on documents used by agencies when an individual is asked to provide personal data. It is required for any forms, surveys, or other documents, including electronic forms, used to solicit personal information from individuals that will be maintained in a system of records.

Mark the appropriate response.

Options	
<input checked="" type="checkbox"/>	Privacy Act Statement
<input type="checkbox"/>	Not Applicable
<input type="checkbox"/>	Unknown

5.4 Is providing the PII mandatory or voluntary? What is the effect on the individual by not providing the information?

Providing PII is mandatory. The individual's failure to disclose all requested PII may delay the processing of their claim(s).

6 Records and Information Management-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). Records/data and information with historical value, identified as having a "permanent" disposition, are transferred to the National Archives of the United States at the end of their retention period. All other records identified as having a "temporary" disposition are destroyed at the end of their retention period in accordance with the NARA Records Schedule or the General Records Schedule.

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, agencies are required to establish procedures for addressing Records and Information Management (RIM) requirements. This includes strategies for establishing and managing recordkeeping requirements and disposition instructions before approving new electronic information systems or enhancements to existing systems.

The following questions are intended to determine whether the records/data and information in the system have approved records retention schedules and disposition instructions, whether the system incorporates RIM strategies including support for [NARA's Universal Electronic Records Management \(ERM\) requirements](#), and if a mitigation strategy is needed to ensure compliance.

If the project/system:

Employees' Compensation Operation and Management Portal (ECOMP)	Version 1.0
Privacy Impact Assessment	10/17/2023

- Does not have an approved records retention schedule and/or
- Does not have an *automated* RIM functionality
- Involves a cloud solution
- And/or if there are additional questions regarding Records and Information Management - Retention and Disposal, please contact the NRC Records staff at ITIMPolicy.Resource@nrc.gov for further guidance.

If the project/system has a record retention schedule or an automated RIM functionality, please complete the questions below.

6.1 Does this project map to an applicable retention schedule in NRC's Comprehensive Records Disposition Schedule (NUREG-0910), or NARA's General Records Schedules?

<input type="checkbox"/>	NUREG-0910, "NRC Comprehensive Records Disposition Schedule"
<input checked="" type="checkbox"/>	NARA's General Records Schedules
<input type="checkbox"/>	Unscheduled

6.2 If so, cite the schedule number, approved disposition, and describe how this is accomplished.

System Name (include sub-systems, platforms, or other locations where the same data resides)	ECOMP
Records Retention Schedule Number(s)	<p>GRS 2.4 item 100 – Workers' Compensation (personnel injury compensation) records. Records of agencies that forward case file material to DOL for retention in DOL's master OWCP records and</p> <p>GRS 2.4 item 101 - Workers' Compensation (personnel injury compensation) records. Records of agencies that do not forward case file material to DOL for retention in DOL's master OWCP records.</p>
Approved Disposition Instructions	<ul style="list-style-type: none"> • Item 100 - Temporary. Destroy 3 years after compensation ceases or when deadline for filing a claim has passed. • Item 101 - Temporary. Destroy 15 years after compensation ceases or when deadline for filing a claim has passed.

Employees' Compensation Operation and Management Portal (ECOMP)	Version 1.0
Privacy Impact Assessment	10/17/2023

Is there a current automated functionality or a manual process to support RIM requirements? This includes the ability to apply records retention and disposition policies in the system(s) to support records accessibility, reliability, integrity, and disposition.	N/A
Disposition of Temporary Records Will the records/data or a composite be automatically or manually deleted once they reach their approved retention?	Yes
Disposition of Permanent Records Will the records be exported to an approved format and transferred to the National Archives based on approved retention and disposition instructions? If so, what formats will be used? <u>NRC Transfer Guidance (Information and Records Management Guideline - IRMG)</u>	N/A

7 Paperwork Reduction Act

The Paperwork Reduction Act (PRA) of 1995 requires that agencies obtain an Office of Management and Budget (OMB) approval in the form of a "control number"—before promulgating a paper form, website, surveys, questionnaires, or electronic submission from 10 or more members of the public. If the data collection is from federal employees regarding work-related duties, then a PRA clearance is not necessary.

7.1 Will the project be collecting any information from 10 or more persons who are not Federal employees?

Yes.

7.2 Is there any collection of information addressed to all or a substantial majority of an industry (i.e., Fuel Fabrication Facilities or Fuel Cycle Facilities)?

No.

7.3 Is the collection of information required by a rule of general applicability?

No.

Note: For information collection (OMB clearances) questions: contact the NRC's Clearance Officer. Additional guidance can be found on the NRC's internal Information Collections Web page at: <https://intranet.nrc.gov/ocio/33456>.

Employees' Compensation Operation and Management Portal (ECOMP)	Version 1.0
Privacy Impact Assessment	10/17/2023

8 Privacy Act Determination

Project/System Name: Employees' Compensation Operation and Management Portal (ECOMP)

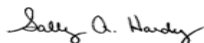
Submitting Office: Office of the Chief Information Officer (OCIO)

Privacy Officer Review

Review Results		Action Items
<input type="checkbox"/>	This project/system does not contain PII.	No further action is necessary for Privacy.
<input type="checkbox"/>	This project/system does contain PII ; the Privacy Act does NOT apply, since information is NOT retrieved by a personal identifier.	Must be protected with restricted access to those with a valid need-to-know.
<input checked="" type="checkbox"/>	This project/system does contain PII ; the Privacy Act does apply.	SORN is required- Information is retrieved by a personal identifier.

Comments:

Covered by Government-wide System of Records Notice OPM/GOVT – General Personal Records and DOL/GOVT-1 Office of Workers' Compensation Programs, Federal Employee's Compensation Act File.

Reviewer's Name	Title
 Signed by Hardy, Sally on 01/18/24	Privacy Officer


Employees' Compensation Operation and Management Portal (ECOMP)	Version 1.0
Privacy Impact Assessment	10/17/2023

9 OMB Clearance Determination

NRC Clearance Officer Review

Review Results	
<input type="checkbox"/>	No OMB clearance is needed.
<input type="checkbox"/>	OMB clearance is needed.
<input checked="" type="checkbox"/>	Currently has OMB Clearance. Clearance No. DOL/OWCP 1240-0007, 1240-0009, 1240-0013, 1240-0037, 1240-0046

Comments:


Reviewer's Name	Title
 <p>Signed by Cullison, David on 01/18/24</p>	Agency Clearance Officer

Employees' Compensation Operation and Management Portal (ECOMP)	Version 1.0
Privacy Impact Assessment	10/17/2023

10 Records Retention and Disposal Schedule Determination Records Information Management Review

Review Results	
<input type="checkbox"/>	No record schedule required.
<input type="checkbox"/>	Additional information is needed to complete assessment.
<input type="checkbox"/>	Needs to be scheduled.
<input checked="" type="checkbox"/>	Existing records retention and disposition schedule covers the system - no modifications needed.

Comments:

Reviewer's Name	Title
 Signed by Dove, Marna on 11/15/23	Sr. Program Analyst, Electronic Records Manager

Employees' Compensation Operation and Management Portal (ECOMP)	Version 1.0
Privacy Impact Assessment	10/17/2023

11 Branch Chief Review and Concurrence

Review Results	
<input type="checkbox"/>	This project/system does not collect, maintain, or disseminate information in identifiable form.
<input checked="" type="checkbox"/>	This project/system does collect, maintain, or disseminate information in identifiable form.

I concur with the Privacy Act, Information Collections, and Records Management reviews.



Signed by Feibus, Jonathan
on 01/18/24

Chief Information Security Officer
Chief Information Security Division
Office of the Chief Information Officer

Employees' Compensation Operation and Management Portal (ECOMP)	Version 1.0
Privacy Impact Assessment	10/17/2023

ADDITIONAL ACTION ITEMS/CONCERNS

Name of Project/System:	
Employees' Compensation Operation and Management Portal (ECOMP)	
Date CSB received PIA for review:	Date CSB completed PIA review:
October 25, 2023	January 18, 2024
Action Items/Concerns:	
<i>Copies of this PIA will be provided to:</i>	
<i>Caroline Carusone Director IT Services Development and Operations Division Office of the Chief Information Officer</i>	
<i>Garó Nalabandian Deputy Chief Information Security Officer (CISO) Office of the Chief Information Officer</i>	