
U.S. Nuclear Regulatory Commission



**Privacy Impact Assessment
NRC Careers System (NRCareers)**

**Office of the Chief Information Officer (OCIO)/
Office of the Chief Human Capital Officer (OCHCO)**

**Version 1.0
12/15/2023**

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Privacy Impact Assessment	12/15/2023

Document Revision History

Date	Version	PIA Name/Description	Author
12/15/2023	1.0	NRC Careers System (NRCareers) - Final Release	OCIO/OCHCO Oasis Systems, LLC
11/28/2023	DRAFT	NRC Careers System (NRCareers) - Draft Release	OCIO/OCHCO Oasis Systems, LLC

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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: NRC Careers System (NRCareers).

Data Storage Location (i.e., Database Server, SharePoint, Cloud, Other Government Agency, Power Platform): NRCareers is hosted by Monster Government Solutions in a Government Community Cloud.

Date Submitted for review/approval: December 15, 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.

NRCareers is the Nuclear Regulatory Commission’s (NRC’s) cloud-based job application system that facilitates the posting of vacancy announcements to the Office of Personnel Management’s (OPM’s) USAJOBS system and gives applicants the ability to apply for vacancies online.

The NRCareers system is an online web application that gives job seekers the ability to create and advertise their resumes, search government jobs, and apply for a job directly through an online web application. The Office of the Chief Human Capital Officer (OCHCO) personnel uses NRCareers to create and advertise government jobs, source candidates for employment consideration, and manage the agency’s recruiting and hiring process. The NRC leverages the USAJOBS system to post its positions; however, the agency’s recruitment system is NRCareers. NRCareers is hosted by Monster Government Solutions in their Monster Hiring Management Enterprise (MHME) Software as a Service cloud-based system. NRCareers is procured by the NRC through an interagency agreement with the Department of the Interior’s Interior Business Center.

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: Cloud-based system	

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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	Dariele Taswell	Richard Revzan	Natalya Bobryakova	Dariele Taswell	John Shea	Richard Revzan
Office /Division /Branch	Office of the Chief Human Capital Officer (OCHCO) / Associate Director for Human Resources Operations and Policy (ADHROP) / Operations Branch	Office of the Chief Human Capital Officer (OCHCO)/ Associate Director for Human Resources Operations and Policy (ADHROP)	Office of the Chief Information Officer (OCIO) / Cyber and Infrastructure Security Division (CISD)	Office of the Chief Human Capital Officer (OCHCO) / Associate Director for Human Resources Operations and Policy (ADHROP) / Operations Branch	Office of the Chief Human Capital Officer (OCHCO) / Human Capital Analysis Branch (HCAB)	Office of the Chief Human Capital Officer (OCHCO)/ Associate Director for Human Resources Operations and Policy (ADHROP)
Telephone	301-287-0728	301-415-5140	301-287-0671	301-287-0728	(301) 415-0246	301-415-5140

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

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Mark with an "X" on all that apply.	Authority	Citation/Reference
<input type="checkbox"/>	Statute	
<input type="checkbox"/>	Executive Order	
<input type="checkbox"/>	Federal Regulation	
<input type="checkbox"/>	Memorandum of Understanding/Agreement	
<input checked="" type="checkbox"/>	Other (summarize and provide a copy of relevant portion)	OPM E-Government Initiative, Recruitment One-Stop

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).

Data that is collected is used for resume creation and applicant identification.

NRCareers supports the following functions:

- online vacancy creation by the OCHCO personnel
- online application process
- interfaces to required web sites such as the OPM's USAJOBS
- automated rating process

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

NRCareers maintains an applicant's Social Security number (SSN) as a unique identifier.

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 checked="" 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](#).

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Categories of Information			
<input checked="" type="checkbox"/>	Name	<input checked="" 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 type="checkbox"/>	Credit/Debit Card Number
<input checked="" type="checkbox"/>	Social Security number (Truncated or Partial)	<input 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 checked="" type="checkbox"/>	Personal e-mail address	<input type="checkbox"/>	Biometric identifiers (facial images, fingerprints, iris scans)
<input 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 type="checkbox"/>	Marital Status	<input checked="" type="checkbox"/>	Other: employment history, training and awards, education, and references.
<input type="checkbox"/>	Children Information		
<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).

Information is collected electronically through forms listed in the Required Documents of the job postings on the USAJOBS and NRCareers web applications.

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

- [Optional Form 306, Declaration for Federal Employment](#)
- [SF-50, Notification of Personnel Action](#)
- [SF-15, Application for 10-Point Veteran Preference](#)

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

The information is provided directly by the individual.

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

The information is self-reported by the subject individual through the USAJOBS and NRCareers web applications. Individuals are responsible for verifying their data for accuracy.

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

N/A.

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

Individuals are expected to provide accurate information. They can notify the OCHCO personnel if they need to correct their inaccurate or erroneous information.

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).

OCHCO personnel and offices that have position vacancies have access to the data in the system.

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.

NRCareers shares the information on the selectees with the Workforce Transformation Tracking System (WTTS) and the Entrance on Duty System (EODS), the NRC's onboarding solutions.

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

N/A.

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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:
<input type="checkbox"/>	Memorandum of Understanding Provide ADAMS ML number for MOU:
<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.

Access to the system is requested via a request form used for all HR systems. The NRCareers System Administrator sets up access based on this request.

OCHCO staff access the system via a Single Sign-on authentication service provided by the agency's Identity, Credential, and Access Management (ICAM) Authentication Gateway.

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).

Data is transmitted through a Secure File Transfer Protocol connection which encrypts data during transmission.

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

NRCareers is hosted by Monster Government Solutions in a Government Community Cloud.

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

N/A.

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

The NRCareers application is hosted by Monster Government Solutions, a Cloud Service Provider (CSP). The CSP staff do not possess NRC badges. OCHCO employs several NRC-badged contractors who review and update information in the system.

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

Only authorized users have access to the system. The CSP and OCHCO administrators review auditable events, audit logs, and audit reporting records for indications of inappropriate or unusual activity and follow their incident response procedures to report any suspicious activity.

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The OCHCO staff must report any misuse of data to the NRC Computer Security and Incident Response Team (CSIRT).

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

N/A.

4.11 Define which FISMA boundary this project is part of.

NRCareers is a component of the NRC's Third Party System (TPS) OCHCO External Services (OES) subsystem. NRC granted an Authority to Operate (ATO) for NRCareers, as a component of the TPS-OES subsystem, on January 09, 2023, ADAMS accession number (ML23020A900).

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 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.

NRCareers is a component of TPS-OES. The TPS EA Number is 20180002.

5 Privacy Act Determination

5.1 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 checked="" type="checkbox"/>	List the identifiers that will be used to retrieve the information on the individual. Information can be retrieved by the vacancy announcement number and an applicant's name.
<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 SORN, OPM/GOVT-5 (Recruiting, Examining, and Placement Records)
<input type="checkbox"/>	SORN is in progress
<input type="checkbox"/>	SORN needs to be created
<input type="checkbox"/>	Unaware of an existing SORN
<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

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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?

Yes, providing PII is mandatory in a Federal recruiting and hiring process. The effect on the individual by not providing the required PII could impact determination of their eligibility for a Federal job.

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:

- Does not have an approved records retention schedule and/or
- Does not have an *automated* RIM functionality,
- Involves a cloud solution,

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- 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)	NRC Careers System (NRCareers)
Records Retention Schedule Number(s)	GRS 2.1, Item 020 : Official record copy of position description GRS 2.1, Item 060 : Job application packages
Approved Disposition Instructions	GRS 2.1, Item 020 : Temporary. Destroy 2 years after position is abolished or description is superseded, but longer retention is authorized if required for business use. GRS 2.1, Item 060 : Temporary. Destroy 1 year after date of submission.
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?	The records/data is deleted manually.

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<p>Disposition of Permanent Records</p> <p>Will the records be exported to an approved format and transferred to the National Archives based on approved retention and disposition instructions?</p> <p>If so, what formats will be used?</p> <p>NRC Transfer Guidance (Information and Records Management Guideline - IRMG)</p>	<p>N/A</p>
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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, the project will be collecting information from 10 or more persons who are not Federal employees.

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)?

N/A.

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

Yes. OMB approved an information collection for NRCareers (Monster Government Solutions): as OMB Control No. 3150-0260 with a three-year expiration date of 07/31/2026.

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>.

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8 Privacy Act Determination

Project/System Name: NRC Careers System (NRCareers).

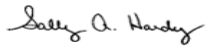
Submitting Office: Office of the Chief Human Capital Officer (OCHCO).

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 SORN, OPM/GOVT-5 (Recruiting, Examining, and Placement Records).

Reviewer's Name	Title
 Signed by Hardy, Sally on 01/12/24	Privacy Officer


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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. <u>Clearance No.3150-0260</u>

Comments:

Reviewer's Name	Title
 Signed by Cullison, David on 01/11/24	Agency Clearance Officer


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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 01/12/24	Sr. Program Analyst, Electronic Records Manager

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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 01/16/24

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

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ADDITIONAL ACTION ITEMS/CONCERNS

Name of Project/System: NRC Careers System (NRCareers)	
Date CISD received PIA for review: December 15, 2023	Date CISD completed PIA review: January 12, 2024
Action Items/Concerns: 	
<p><i>Copies of this PIA will be provided to:</i></p> <p><i>Caroline Carusone</i> <i>Director</i> <i>IT Services Development and Operations Division</i> <i>Office of the Chief Information Officer</i></p> <p><i>Garo Nalabandian</i> <i>Deputy Chief Information Security Officer (CISO)</i> <i>Office of the Chief Information Officer</i></p>	