
U.S. Nuclear Regulatory Commission



Privacy Impact Assessment *iGoFigure Membership & Business Management Software* OCHCO

**Version 1.0
02/15/2024**

Instruction Notes:

Please do not enter the PIA document into ADAMS. An ADAMS accession number will be assigned through the e-Concurrence system which will be handled by the Privacy Team

Template Version 2.0 (08/2023)

iGoFigure	Version 1.0
Privacy Impact Assessment	02/15/2024

Document Revision History

Date	Version	PIA Name/Description	Author
02/15/2024	1.0	iGoFigure 2023 update	John E Shea

iGoFigure	Version 1.0
Privacy Impact Assessment	02/15/2024

Table of Contents

1	Description	1
2	Authorities and Other Requirements	2
3	Characterization of the Information	4
4	Data Security	6
5	Privacy Act Determination	8
6	Records and Information Management-Retention and Disposal	10
7	Paperwork Reduction Act	11
8	Privacy Act Determination	13
9	OMB Clearance Determination	14
10	Records Retention and Disposal Schedule Determination	15
11	Branch Chief Review and Concurrence	16

iGoFigure	Version 1.0
Privacy Impact Assessment	02/15/2024

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: iGoFigure® Membership & Business Management Software

Data Storage Location (i.e., Database Server, SharePoint, Cloud, Other Government Agency, Power Platform) A small, non-networked, SQL Server Express database contains all fitness center membership data. The SQL Server Express engine and management system are installed on the fitness center CPU.

Date Submitted for review/approval: February 15, 2024

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.

iGoFigure® Membership & Business Management Software makes it possible to easily manage a fitness center. It allows the tracking of members' attendance, results, and progress, organizes special populations based on health or medical considerations, and maintains a complete status history for each member. iGoFigure also provides robust membership reporting capabilities for effective health club management.

iGoFigure’s primary focus is creating a high-quality software product that effectively manages member and customer information, provides easy payment processing and money management, tracks inventory, includes robust reporting capabilities and reduces time and effort associated with running a business.

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 - Management Software installed on Fitness Center CPU	

iGoFigure	Version 1.0
Privacy Impact Assessment	02/15/2024

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.
<input checked="" type="checkbox"/>	Annual Review This document is updated to make use of NRC's most recent PIA 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	Ilka Solario	John Shea	Brendan Cain	Ilka Solario	John Shea	Nancy Osborn
Office/ Div/Br	OCHCO/ HCAB	OCHCO/ HCAB	OCHCO/ HCAB	OCHCO/ HCAB	OCHCO/ HCAB	OCHCO/ HCAB
Telephone	301-287-0591	301-415-0246	301-287-0552	301-287-0591	301-415-0246	301-415-8379

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.

Mark with an "X" on all that apply.	Authority	Citation/Reference
<input type="checkbox"/>	Statute	
<input checked="" type="checkbox"/>	Executive Order	5 U.S.C. 7901; Executive Order (E.O.) 9397, as amended by E.O. 13478
<input type="checkbox"/>	Federal Regulation	
<input type="checkbox"/>	Memorandum of Understanding/Agreement	
<input type="checkbox"/>	Other (summarize and provide a copy of relevant portion)	

iGoFigure	Version 1.0
Privacy Impact Assessment	02/15/2024

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).

Information entered into iGoFigure is used to document member attendance, fitness level and progress. The Fitness Center staff uses the application to achieve members' fitness goals and suggest related training and classes to advance fitness.

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

iGoFigure neither requires nor requests user SSN information.

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 checked="" type="checkbox"/>	Information collection is limited to NRC employees who apply for membership at the Fitness Center, including current and former members.

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"/>	Résumé or curriculum vitae
<input 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 type="checkbox"/>	Social Security number (Truncated or Partial)	<input checked="" type="checkbox"/>	Medical/health information
<input checked="" type="checkbox"/>	Gender	<input type="checkbox"/>	Alien Registration Number
<input type="checkbox"/>	Ethnicity	<input type="checkbox"/>	Professional/personal references

Categories of Information			
<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 type="checkbox"/>	Personal Bank Account Number	<input checked="" 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 type="checkbox"/>	Other
<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).

Employees may provide data using NRC Form 681.

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

[NRC 681– NRC Fitness Center Membership Application](#)

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

Employees may submit their own data.

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

Before importing to iGoFigure database, PDF Form data is exported to a spreadsheet that verifies for field lengths and formats.

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?

Fitness center members may request changes to their iGoFigure accounts with fitness center staff.

iGoFigure	Version 1.0
Privacy Impact Assessment	02/15/2024

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).

Fitness center manager, fitness center staff and iGoFigure system administrator.

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.

Information is not shared.

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

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 checked="" type="checkbox"/>	None

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

Only approved contractor staff have access to iGoFigure and the Fitness Center. A username and complex password are required for fitness center staff to access iGoFigure. System data is saved to a restricted network drive. Detailed instructions for accessing iGoFigure system security and application features are documented in the NRC's Fitness Services contractor's Employee's Procedure Manual.

NRC's Fitness Center front desk is continuously monitored by one or more Fitness Center contractor employees at a time. All Fitness Center employees have successfully completed the required background and clearance process through the NRC. In addition, NRC's Fitness Services contract is required to go over the Privacy Act notification and their responsibilities with all of their staff. The Fitness Services System of Records manager also sends annual guidance reminders on how to safeguard and prevent misuse of data. The Fitness Center closing procedures requires that all programs and computers are logged off and completely shut down at COB.

iGoFigure	Version 1.0
Privacy Impact Assessment	02/15/2024

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).

iGoFigure data is not transmitted. Data is only used from within the iGoFigure application, which only permits access to configured fitness staff users using unique, complex passwords.

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

Data are stored to secured NRC network location, (R:\IGOFigure).

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

iGoFigure is only installed on fitness center workstation. Data is only accessible from the NRC network.

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

Yes, fitness center staff are badged contractors.

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

NRC's Fitness Center front desk is continuously monitored by one or more Fitness Center contractor employees at a time. All Fitness Center employees have successfully completed the required background and clearance process through the NRC. In addition, NRC's Fitness Services contract is required to go over the Privacy Act notification and their responsibilities with all of their staff. The Fitness Services System of Records manager also sends annual guidance reminders on how to safeguard and prevent misuse of data. The Fitness Center closing procedures requires that all programs and computers are logged off and completely shut down at COB.

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

iGoFigure does not literally identify employees. But the software allows users to monitor changes in their own fitness. iGoFigure records date/times associated with workout data.

4.11 Define which FISMA boundary this project is part of.

ITI – Information Technology Infrastructure – data resides on an ITI workstation located in the fitness center.

4.12 Is there an Authority to Operate (ATO) associated with this project/system?

Authorization Status	
<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: <insert appropriate response>
<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.

ITI 20090005

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. Employee Name, Employee Identification Number
<input type="checkbox"/>	No, the PII is not retrieved by a personal identifier. If no, explain how the data is retrieved from the project. <Insert response here>

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.

iGoFigure	Version 1.0
Privacy Impact Assessment	02/15/2024

Response	
<input checked="" type="checkbox"/>	<p>Yes, this system is covered by an existing SORN. (See existing SORNs: https://www.nrc.gov/reading-rm/foia/privacy-systems.html)</p> <p>Provide the SORN name, number, (List all SORNs that apply):</p> <p>NRC 44 - Employee Fitness Center</p>
<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 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"/>	<p>Privacy Act Statement</p> <p>1. Access <u>NRC Form 681– NRC Fitness Membership Application</u></p> <p>2. Click “GO TO PRIVACY ACT STATEMENT” button in PDF header</p>
<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?

Voluntary

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

iGoFigure	Version 1.0
Privacy Impact Assessment	02/15/2024

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,
- 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

iGoFigure	Version 1.0
Privacy Impact Assessment	02/15/2024

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)	iGoFigure
Records Retention Schedule Number(s)	<p>Health/Fitness Data: GRS 2.7 item 080 – Non-occupational health and wellness program records</p> <p>Hard copy source data: GRS 5.2 item 020 – Intermediary records</p> <p>Payroll deduction: GRS 2.4 item 010 – Records used to calculate payroll, arrange paycheck deposit, and change previously issued paychecks</p>
Approved Disposition Instructions	<p>GRS 2.7 item 080 – Temporary. Destroy 3 years after the project/activity/or transaction is completed or superseded, but longer retention is authorized if needed for business use.</p> <p>GRS 5.2 item 020 – Temporary. Destroy upon creation or update of the final record, or when no longer needed for business use, whichever is later.</p> <p>GRS 2.4 item 010 – Temporary. Destroy 3 years after paying agency or payroll processor validates data, but longer retention is authorized if required for business use.</p>
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.	TBD
Disposition of Temporary Records	TBD
Will the records/data or a composite be automatically or manually deleted once they reach their approved retention?	

iGoFigure	Version 1.0
Privacy Impact Assessment	02/15/2024

<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>TBD</p>
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Note: Information in *Section 6, Records and Information Management-Retention and Disposal*, does not need to be fully resolved for final approval of the privacy impact assessment.

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?

No

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>.

STOP HERE - The remaining pages will be completed by the Privacy Officer, Records Management, and Information Collections Team.

iGoFigure	Version 1.0
Privacy Impact Assessment	02/15/2024

8 Privacy Act Determination

Project/System Name: iGoFigure Membership & Business Management Software

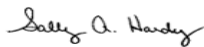
Submitting Office: OCHCO

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 *NRC 44 - Employee Fitness Center.*

Reviewer's Name	Title
 Signed by Hardy, Sally on 04/09/24	Privacy Officer


9 OMB Clearance Determination

NRC Clearance Officer Review

Review Results	
<input type="checkbox"/>	No OMB clearance is needed.
<input checked="" type="checkbox"/>	OMB clearance is needed.
<input type="checkbox"/>	Currently has OMB Clearance. Clearance No. _____

Comments:

The information collected from Federal employees to populate this system is not related to their professional capacities and is subject to the requirements of the Paperwork Reduction Act.


Reviewer's Name	Title
 Signed by Cullison, David on 03/13/24	Agency Clearance Officer

10 Records Retention and Disposal Schedule Determination

Records Information Management Review

Review Results	
<input type="checkbox"/>	No record schedule required.
<input checked="" 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 03/15/24	Sr. Program Analyst, Electronic Records Manager

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 04/15/24

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

iGoFigure	Version 1.0
Privacy Impact Assessment	02/15/2024

ADDITIONAL ACTION ITEMS/CONCERNS

Name of Project/System: iGoFigure Membership & Business Management Software	
Date CISD received PIA for review: February 28, 2024	Date CISD completed PIA review: April 8, 2024
Action Items/Concerns: 	
<p><i>Copies of this PIA will be provided to:</i></p> <p><i>Gwen Hayden Acting Director IT Services Development and Operations Division Office of the Chief Information Officer</i></p> <p><i>Katie Harris Acting Deputy Director Chief Information Security Officer (CISO) Office of the Chief Information Officer</i></p>	