
U.S. Nuclear Regulatory Commission



Privacy Impact Assessment Departures and Exit Surveys (previously Recruitment Activity Tracking System (RATS)) OCHCO

**Version 4.0
03/19/2024**

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)

Departure and Exit Surveys	Version 2.0
Privacy Impact Assessment	03/19/2024

Document Revision History

Date	Version	PIA Name/Description	Author
04/01/2008	1.0	RATS Initial Release: ML081050423	Kathy Schmidt
06/16/2008	2.0	RATS updated to remove PII and exclude Workforce Tracking capabilities. Only exit survey functionality remains. ML081050423	Rick Grancorvitz
06/22/2020	3.0	Minor revisions to PIA template, updated POCs. ML20157A058	John E Shea
03/19/2024	4.0	Departures and Exit Surveys updated to conform with new PIA Template	John E Shea

Departure and Exit Surveys	Version 2.0
Privacy Impact Assessment	03/19/2024

Table of Contents

1	Description	1
2	Authorities and Other Requirements	2
3	Characterization of the Information	3
4	Data Security	5
5	Privacy Act Determination	7
6	Records and Information Management-Retention and Disposal	8
7	Paperwork Reduction Act	10
8	Privacy Act Determination	11
9	OMB Clearance Determination	12
10	Records Retention and Disposal Schedule Determination	13
11	Branch Chief Review and Concurrence	14

Departure and Exit Surveys	Version 2.0
Privacy Impact Assessment	03/19/2024

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: Departures and Exit Surveys

Data Storage Location (i.e., Database Server, SharePoint, Cloud, Other Government Agency, Power Platform) NRC on-premises SQL Server

Date Submitted for review/approval: System authorized in October 2013, was originally included within the TTC's system boundaries, and is listed in agency TRM. It is now in the Business Application Support System (BASS) FISMA boundary.

Note: When completing this PIA do not include any information that would raise security concerns or prevent this document from being made publicly available.

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 former Recruitment Activity Tracking System (RATS) is now called Departures and Exit Surveys and is a web-based database used to send out and record Exit Surveys to departing employees. This is used for the purpose of obtaining feedback from employees on their various reasons for leaving the agency.

The system consists of a web form/module developed in Cold Fusion with a back-end MS SQL server database that allows survey invitees to choose selections from a web form and saves these selections to the database.

This supports the office of Human Resources (HR), Human Capital Analysis Branch (HCAB) and helps to improve employee/management relations, realize and correct issues on various levels and provide feedback to management on areas of improvement.

HCAB enters employees who will be leaving the agency into the system. They track the number of departing employees in the reports. The automated part runs a nightly file to review for employees departing the agency within two weeks and sends them an email notifying them of the Exit survey to fill out prior to their departure. The employee fills out the survey. The results are compiled by HCAB for the improvement of the agency.

Departure and Exit Surveys	Version 2.0
Privacy Impact Assessment	03/19/2024

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 form/module with a backend SQL Server database	

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> <Insert response here >
<input checked="" type="checkbox"/>	Annual Review <i>If making minor edits to an existing system/project, briefly describe the changes below.</i> This revision updates existing PIA to conform with updated document template.
<input type="checkbox"/>	Other (explain)

1.3 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	System Owner/ Data Owner/ Steward	ISSO	Business Project Manager	Technical Project Manager	Executive Sponsor
Name	John E Shea	John E Shea	Consuella Debnam		Roger Swiger	Mary Lamary
Office /Division /Branch	OCHCO /HCAB	OCHCO/HCAB	OCIO		OCHCO /ADHRTD	OCHCO
Telephone	301-415-0246	301-415-0246	301-287-0834		423-855-6446	301-415-3300

Departure and Exit Surveys	Version 2.0
Privacy Impact Assessment	03/19/2024

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 checked="" type="checkbox"/>	Statute	U.S. Code Title 5 Section 1104 (5 USC 1104)
<input type="checkbox"/>	Executive Order	<Insert response here >
<input type="checkbox"/>	Federal Regulation	<Insert response here >
<input type="checkbox"/>	Memorandum of Understanding/Agreement	<Insert response here >
<input checked="" type="checkbox"/>	Other (summarize and provide a copy of relevant portion)	Government-wide system OPM/GOVT-5 (Recruiting, Examining, and Placement Records). (previously covered under NRC 28 Merit Selection Records)

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).

System is used to track employee departures and gather employee feedback related to workplace satisfaction and reasons for separating from NRC. Solicited information is used to measure trends and improve employee-retention.

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

NA

Departure and Exit Surveys	Version 2.0
Privacy Impact Assessment	03/19/2024

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 <Insert response here>

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 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 type="checkbox"/>	Home Address	<input type="checkbox"/>	Credit/Debit Card Number
<input 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 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 type="checkbox"/>	Personal Mobile Number	<input type="checkbox"/>	Accommodation/disabilities information
<input type="checkbox"/>	Marital Status	<input checked="" type="checkbox"/>	Other - Separating employees sometimes enter potentially uncomfortable information, (if shared agency-wide), in the comment boxes.
<input type="checkbox"/>	Children Information		
<input type="checkbox"/>	Mother's Maiden Name		

Departure and Exit Surveys	Version 2.0
Privacy Impact Assessment	03/19/2024

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).

An automated report runs nightly to identify employees departing the agency within two weeks. Employees are sent invitations to access and populate the Exit survey prior to their departure. Employees may voluntarily indicate factors that lead to their separations and/or document opinions/ideas about employment at NRC. The results are compiled by HCAB in a variety of exit survey reports.

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

NRC form NRC-730 is used as a reference to propose, document and approve changes to the online exit-survey questionnaire. The current form 730 is the official record of the questions presented in the online exit-survey form/module. However, users do not record information on this form. Users enter their opinions directly into the web form/module that is designed to mirror the content of Form 730.

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

Separating employees **enter personal opinions related to their own** employment experiences.

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

The separating employee completes the survey. Survey invitation links cannot be shared. Survey links are only accessible from NRC network. Survey links expire after invited employee separates from NRC.

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?

Employees may update survey responses until their date of departure.

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).

System admins can access the exit survey data. Presently, this includes a pair of badged, NRC contracted developers and two OCHCO/HCAB employees. Select HR Specialists may access data for any single employee who has completed an exit survey. After analysis, exit survey data is compiled and shared with Senior Administrators from OCHCO and SBCR.

Departure and Exit Surveys	Version 2.0
Privacy Impact Assessment	03/19/2024

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.

NA

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

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.

Invited users access the exit survey data through a URL embedded in an internal email. Links only work for the invited employee. Select HR Specialists may access data for any single employee who has completed an exit survey. After analysis, exit survey data is compiled and shared with Senior Administrators from OCHCO and SBCR. Links to survey data, similarly, cannot be shared beyond original recipients.

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).

Access level controls are in place and a record of the date/time and user ID are kept when records are inserted or modified. Invited users enter information through a web interface. Records are written directly to dedicated on-site SQL Server database.

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

Exit survey data is housed on-site on an NRC administered MS SQL Server in a dedicated database.

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

Access to the Exit Survey tool is dependent on LAN access. Remote users and regional users can access provided their NRC LAN account is signed into the network; and their LAN account is issued a role-based permission by an Exit Survey admin.

Departure and Exit Surveys	Version 2.0
Privacy Impact Assessment	03/19/2024

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

Yes, the system is developed by a pair of badged NRC contractors.

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

Access level controls are in place and a record of the date/time and user ID are kept when records are inserted or modified. Links to surveys or exit survey data cannot be shared.

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

NA

4.11 Define which FISMA boundary this project is part of.

BASS

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: <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

Departure and Exit Surveys	Version 2.0
Privacy Impact Assessment	03/19/2024

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

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5 Privacy Act Determination

5.1 Is the data collected retrieved by a personal identifier?

Mark the appropriate response.

Response	
<input 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. <Insert response here>
<input checked="" type="checkbox"/>	No, the PII is not retrieved by a personal identifier. If no, explain how the data is retrieved from the project. Information is retrieved by month/year or by office.

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 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):
<input type="checkbox"/>	SORN is in progress
<input type="checkbox"/>	SORN needs to be created
<input type="checkbox"/>	Unaware of an existing SORN
<input checked="" type="checkbox"/>	No, this system is not a system of records and a SORN is not applicable.

Departure and Exit Surveys	Version 2.0
Privacy Impact Assessment	03/19/2024

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 type="checkbox"/>	Privacy Act Statement (Insert link to Privacy Act Statement (PAS) for each form, webpage or survey etc.)
<input checked="" 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?

Participation in the separating employees exit survey is voluntary. Employees who choose not to complete the survey are still allowed to separate from the agency.

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.

Departure and Exit Surveys	Version 2.0
Privacy Impact Assessment	03/19/2024

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

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)	GRS 2.5.
Records Retention Schedule Number(s)	Item 011 - Temporary.
Approved Disposition Instructions	Destroy 2 years after date of program closure, but longer retention is authorized if required for business use.
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.	No
Disposition of Temporary Records Will the records/data or a composite be automatically or manually deleted once they reach their approved retention?	Manually

Departure and Exit Surveys	Version 2.0
Privacy Impact Assessment	03/19/2024

<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>	No
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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.

Departure and Exit Surveys	Version 2.0
Privacy Impact Assessment	03/19/2024

8 Privacy Act Determination

Project/System Name: Departure and Exit Survey

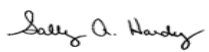
Submitting Office: OCHCO

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 checked="" 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 type="checkbox"/>	This project/system does contain PII ; the Privacy Act does apply.	SORN is required- Information is retrieved by a personal identifier.

Comments:

Information is not retrieved by a personal identifier. Information is retrieved by month/year or by office.

Reviewer's Name	Title
 Signed by Hardy, Sally on 04/22/24	Privacy Officer


Departure and Exit Surveys	Version 2.0
Privacy Impact Assessment	03/19/2024

9 OMB Clearance Determination

NRC Clearance Officer Review

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

Comments: No clearance is needed as long as the information is collected from exiting employees before they are separated.

Reviewer's Name	Title
 Signed by Cullison, David on 04/03/24	Agency Clearance Officer


Departure and Exit Surveys	Version 2.0
Privacy Impact Assessment	03/19/2024

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 04/18/24	Sr. Program Analyst, Electronic Records Manager

Departure and Exit Surveys	Version 2.0
Privacy Impact Assessment	03/19/2024

11 Branch Chief Review and Concurrence

Review Results	
<input checked="" type="checkbox"/>	This project/system does not collect, maintain, or disseminate information in identifiable form.
<input 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 04/22/24

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

Departure and Exit Surveys	Version 2.0
Privacy Impact Assessment	03/19/2024

ADDITIONAL ACTION ITEMS/CONCERNS

Name of Project/System: Departures and Exit Surveys (previously Recruitment Activity Tracking System (RATS))	
Date CISD received PIA for review:	Date CISD completed PIA review:
Action Items/Concerns: 	
<i>Copies of this PIA will be provided to:</i> <i>Gwen Hayden</i> <i>Acting Director</i> <i>IT Services Development and Operations Division</i> <i>Office of the Chief Information Officer</i> <i>Katie Harris</i> <i>Acting Deputy</i> <i>Chief Information Security Officer (CISO)</i> <i>Office of the Chief Information Officer</i>	