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# U.S. Nuclear Regulatory Commission

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## **Privacy Impact Assessment Reasonable Accommodation (RA) System Office of the Chief Human Capital Officer (OCHCO)**

**Version 1.0  
6/26/2024**

Template Version 2.0 (08/2023)

Reasonable Accommodation (RA) System	Version 1.0
Privacy Impact Assessment	6/26/2024

## Document Revision History

Date	Version	PIA Name/Description	Author
6/26/2024	1.0	Initial Release	Jessica Center

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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:** Reasonable Accommodation (RA) System

**Data Storage Location (i.e., Database Server, SharePoint, Cloud, Other Government Agency, Power Platform)**

The RA System is hosted in a FedRAMP authorized cloud service owned/managed by Opexus through a software as a service (SaaS) workforce management suite called, eCASE. Data is stored on Opexus database servers.

**Date Submitted for review/approval:** June 26, 2024.

*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 RA System is a cloud-based Software as a Service (SaaS) hosted by a FedRAMP-authorized third-party vendor (Opexus) to track reasonable accommodations requests. Access to the system is limited to NRC employees. This is being created to streamline processes and tracking/reporting capabilities for those that need a modification or adjustment to a job or work environment.

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

<input type="checkbox"/> PowerApps	<input checked="" type="checkbox"/> Public Website
<input type="checkbox"/> Dashboard	<input checked="" type="checkbox"/> Internal Website
<input type="checkbox"/> SharePoint	<input type="checkbox"/> None
<input checked="" type="checkbox"/> Other: RA is in a FedRAMP authorized cloud	

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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 checked="" type="checkbox"/>	Modification to an existing system/project. <b>Moving data to a FedRAMP cloud service.</b> <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> <a href="#">ML20303A215</a>
<input type="checkbox"/>	Annual Review <i>If making minor edits to an existing system/project, briefly describe the changes below.</i> <a href="#">&lt;Insert response here &gt;</a>
<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	ISSM	Business Project Manager	Technical Project Manager	Executive Sponsor
<b>Name</b>	Jessica Center	Jessica Center	Consuella Debnam	N/A	N/A	N/A
<b>Office/Division/Branch</b>	OCHCO/HROP/PLERB	OCHCO/HROP/PLERB	OCIO/INFOSEC			
<b>Telephone</b>	301-415-5888	301-415-5888	301-287-0834			

## 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	Executive Order 13164: Establishing Procedures to Facilitate the Provision of Reasonable Accommodation.
<input type="checkbox"/>	Federal Regulation	
<input type="checkbox"/>	Memorandum of Understanding/Agreement	
<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*).

Executive Order 13164 requires all agencies to track reasonable accommodations requests. The eCase RA Module will be used to track employee requests for reasonable accommodations, including identification of at least the following information as directed by the EO:

- the number and types of reasonable accommodations that have been requested in the application process and whether those requests have been granted or denied;
- the jobs (occupational series, grade level, and agency component) for which reasonable accommodations have been requested;
- the types of reasonable accommodations that have been requested for each of those jobs;
- the number and types of reasonable accommodations for each job, by agency component, that have been approved, and the number and types that have been denied;
- the number and types of requests for reasonable accommodations that relate to the benefits or privileges of employment, and whether those requests have been granted or denied;
- the reasons for denial of requests for reasonable accommodation;
- the amount of time taken to process each request for reasonable accommodation; and
- the sources of technical assistance that have been consulted in trying to identify possible reasonable accommodations.

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

N/A.

### 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 checked="" 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"/>	<b>Other</b>

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 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 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 checked="" type="checkbox"/>	Emergency contact e.g., a third party to contact in case of an emergency
<input type="checkbox"/>	Personal Mobile Number	<input checked="" type="checkbox"/>	Accommodation/disabilities information
<input type="checkbox"/>	Marital Status	<input checked="" type="checkbox"/>	<b>Other</b> Religion/Religious Preference

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Categories of Information			
<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).**

General information of an employee's name and contact information is collected from the existing NRC Microsoft 365 Directory. Otherwise, data is collected directly from individuals. Individuals may access the system directly to enter information; or the individual will provide their information to a processing representative in OCHCO who will add that information into the system as appropriate.

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

NRC 726, Confirmation of Request for Reasonable Accommodation

\*Note that this information will be provided by the individual via portal entry on the system website.

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

Directly from 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 Reasonable Accommodation Coordinators (or their designee(s)) will verify the accuracy and completeness of data.

**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?**

The individual will have direct edit access to their profile information and will be able to notify designated staff if any information is incorrect.



## 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).

Internal NRC users will have access to the system portal to enter and view their own information. Staff within OCHCO who process Reasonable Accommodation will have access. \*Non-NRC users will not have direct access to their information and will need to resubmit to correct or update information.

### 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.

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.

The system requires user account creation which includes providing an NRC email. The system will be configured for SSO access by NRC staff. Access to data is limited based upon system roles set at account creation.

### 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 may be transmitted from the system to individuals via email. The email will support encryption of PII or PHI.

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

Data is stored at the Opexus FedRAMP data center.

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

Yes. NRC users may access the system remotely via the NRC VPN. Users are required to adhere to NRC's policies for computer use.

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

Yes, a contractor with an NRC badge may access the system portal.

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

System roles and permissions will ensure that only approved users have access to the data and can only make modifications in line with their assigned system role. The system will have versioning tracking which will capture the user information and timestamp associated with modification to data.

**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.**

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

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

EA# for RA– 20200054.

## 5 Privacy Act Determination

### 5.1 Is the data collected retrieved by a personal identifier?

Mark the appropriate response.

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

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**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"/>	<p><b>Yes, this system is covered by an existing SORN. (See existing SORNs: <a href="https://www.nrc.gov/reading-rm/foia/privacy-systems.html">https://www.nrc.gov/reading-rm/foia/privacy-systems.html</a> )</b></p> <p><b>Provide the SORN name, number, (List all SORNs that apply):</b></p> <p>NRC 11 – Reasonable Accommodation Records</p>
<input type="checkbox"/>	<b>SORN is in progress</b>
<input type="checkbox"/>	<b>SORN needs to be created</b>
<input type="checkbox"/>	<b>Unaware of an existing SORN</b>
<input type="checkbox"/>	<b>No, this system is not a system of records and a SORN is not applicable.</b>

**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><b>Privacy Act Statement</b></p> <div style="text-align: center;">   NRC 726.pdf </div>
<input type="checkbox"/>	<b>Not Applicable</b>
<input type="checkbox"/>	<b>Unknown</b>

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

Voluntary. However, if the individual does not provide sufficient PII to establish their identity and their issue, their request may not be processed properly.

## 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,
- 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](mailto: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"/>	<a href="#">NUREG-0910, “NRC Comprehensive Records Disposition Schedule</a>
<input checked="" type="checkbox"/>	<a href="#">NARA’s General Records Schedules</a>
<input type="checkbox"/>	Unscheduled

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

<b>System Name (include sub-systems, platforms, or other locations where the same data resides)</b>	RA System eCase system; RA module
<b>Records Retention Schedule Number(s)</b>	<a href="#">GRS 2.3</a> – Items 010, 020
<b>Approved Disposition Instructions</b>	<a href="#">GRS 2.3 item 010</a> : Employee relations programs' administrative records. Temporary. Destroy 3 years old, but longer retention is authorized if required for business use.  <a href="#">GRS 2.3 item 020</a> : Reasonable or religious accommodation case files. Temporary. Destroy 3 year after employee separation from the agency or all appeals are concluded whichever is later, 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.	Manual
<b>Disposition of Temporary Records</b>  Will the records/data or a composite be automatically or manually deleted once they reach their approved retention?	Yes, Manually.
<b>Disposition of Permanent Records</b>  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?  <a href="#">NRC Transfer Guidance (Information and Records Management Guideline - IRMG)</a>	N/A Records in this system will not be permanent records.

**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.

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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, NRC Form 726 is used when needed.

### 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.**

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## 8 Privacy Act Determination

**Project/System Name:** Reasonable Accommodation (RA) System

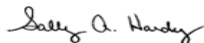
**Submitting Office:** OCHCO

### Privacy Officer Review

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

**Comments:**

Covered by NRC 11 – Reasonable Accommodation Records.

Reviewer's Name	Title
 Signed by Hardy, Sally on 08/01/24	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:

As long as the Reasonable Accommodation System only collects information directly from Federal employees, no clearance is needed. This does not include medical information provided by non-Federal medical professionals. A clearance to collect medical information from non-Federal medical professionals is needed to comply with Federal law. Currently, no such clearance is being developed.


Reviewer's Name	Title
 Signed by Cullison, David on 07/15/24	Agency Clearance Officer

## 10 Records Retention and Disposal Schedule Determination

### Records Information Management Review

Review Results	
<input type="checkbox"/>	No record schedule required.
<input 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 07/17/24	Sr. Program Analyst, Electronic Records Manager

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## 11 Branch Chief Review and Concurrence

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

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



Signed by Nalabandian, Garo  
on 08/01/24

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

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## ADDITIONAL ACTION ITEMS/CONCERNS

<b>Name of Project/System:</b> Reasonable Accommodation (RA) System	
<b>Date CISD received PIA for review:</b> June 26, 2024	<b>Date CISD completed PIA review:</b> July 31, 2024
<b>Action Items/Concerns:</b>          	
<p><i>Copies of this PIA will be provided to:</i></p> <p><i>Gwen Hayden</i> <i>Director</i> <i>IT Services Development and Operations Division</i> <i>Office of the Chief Information Officer</i></p> <p><i>Katie Harris</i> <i>Deputy</i> <i>Chief Information Security Officer (CISO)</i> <i>Office of the Chief Information Officer</i></p>	