
U.S. Nuclear Regulatory Commission



Privacy Threshold Analysis IdeaScale Gov (ISG)

Office of the Chief Information Officer (OCIO)

**Version 1.0
06/26/2024**

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Document Revision History

Date	Version	PTA Name/Description	Author
06/26/2024	1.0	ISG PTA - Initial Release-New Template	OCIO Oasis Systems, LLC
06/05/2024	DRAFT	ISG PTA - Draft Release-New Template	OCIO Oasis Systems, LLC
3/28/2023	N/A	Initial Release (legacy version)	OCIO

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System/Project Name: IdeaScale Gov (ISG).

Data Storage Location (i.e., Database Server, SharePoint, Cloud, Other Government Agency, Power Platform): Data resides within IdeaScale Gov, a cloud platform hosted on Amazon Web Services (AWS) GovCloud (US).

Date Submitted for review/approval: June 26, 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.

IdeaScale Gov (ISG) is an innovation management cloud-based software platform provided by IdeaScale, the cloud service provider, to government agencies as a secure solution for soliciting input from personnel and other stakeholders and collaboratively transforming that input into actionable project plans. ISG is a Software-as-a-Service (SaaS) solution hosted by IdeaScale in a multitenant environment that logically secures and partitions agency data.

The U.S. Nuclear Regulatory Commission’s (NRC’s) instance of ISG allows the NRC Offices to solicit input from personnel, host community conversations, issue crowdsourced challenges, and collect innovative ideas. NRC employees use ISG to submit ideas or vote and comment on ideas from other employees.

The ISG system provides an environment in which the NRC can collect ideas from personnel and develop innovative ideas and goals. The analysis of that data can provide valuable information to be used for various agency change initiatives.

Please indicate if your project/system will involve the following:

<input type="checkbox"/> PowerApps	<input type="checkbox"/> Server/Database Design
<input type="checkbox"/> Dashboard	<input type="checkbox"/> Public Website
<input type="checkbox"/> SharePoint	<input type="checkbox"/> Internal Website
<input checked="" type="checkbox"/> Cloud Service Provider: Cloud-based Web Application The NRC employees log into the IdeaScale application via a web browser and authenticate through the NRC’s Single Sign-On (SSO) service provided by the Identity, Credential, and Access Management (ICAM) Authentication Gateway.	<input type="checkbox"/> Other

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1.2 Does this privacy threshold analysis (PTA) support a proposed new project, proposed modification to an existing project, or other situation? Mark appropriate response in table below.

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 PTA 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. Updated POC list, characterization of information, and transferred the PTA to the latest template.</i>
<input type="checkbox"/>	Other (explain)

1.3 Points of Contact:

	Project Manager	System Owner/Data Owner/Steward	ISSM	Executive Sponsor
Name	Sean Peter	Gwen Hayden	Jonathan Butler	N/A
Office/Division /Branch	Office of Nuclear Regulatory Research(RES)/ Division of Risk Analysis (DRA)/ Human Factors & Reliability Branch (HFRB)	Office of the Chief Information Officer (OCIO)/ IT Services Development & Operations Division (ITSDOD)	Office of the Chief Information Officer (OCIO)/ Cyber and Infrastructure Security Division (CISD) Information Assurance & Oversight Branch (IAOB) /Information Assurance Team (IAT)	N/A
Telephone	301-415-2293	301-287-0761	301-415-2560	N/A

2 Characterization of the Information

Does this project collect, process, or retain information on: (Check all that apply)

Category of individual	
<input checked="" type="checkbox"/>	NRC Federal employees
<input type="checkbox"/>	Other Federal employees

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Category of individual	
<input checked="" type="checkbox"/>	Contractors working on behalf of NRC
<input type="checkbox"/>	Members of the Public (non-licensee workers, applicants before they are licenses etc.)
<input type="checkbox"/>	Project/system does not collect any personally identifiable information
<input type="checkbox"/>	Other

2.1 Please list the data fields/information being collected in the system.

The information being collected is usernames, agency email addresses, and full names.

2.2 Is the project/system collecting information about an individual? If yes, provide a description of the information being collected.

Yes, ISG collects and retains usernames, agency email addresses, and full names.

2.3 Does this project use or collect Social Security Numbers (SSNs)? (This includes truncated SSNs, such as the “last four.”)

No.

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

The data is collected through existing NRC files/databases provided by ICAM’s EIH, which provides a secure central repository for electronic identity information and automates the creation of certain network accounts and services.

2.5 If using a form (paper or web) to collect the information, provide the form number, title and/or a link.

N/A.

2.6 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.

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

If so, identify what agreements are in place with the external non-NRC partners or systems 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 checked="" type="checkbox"/>	Other - FedRAMP Agency ATO, approved on February 13, 2020.
<input type="checkbox"/>	None

2.8 Describe how the data is accessed (NRC network/remotely) and the access control mechanisms that prevent misuse.

Users log into the IdeaScale application via a web browser and authenticate through the NRC SSO provider. Accounts that are authorized through the ICAM SSO provider are previously approved via the NRC account management process. Third Party System (TPS) ISG system owners ensure that users have the appropriate rights/permissions before granting access to the application.

2.9 Define the FISMA boundary this project/system is part of.

ISG is a subsystem of the NRC's TPS.

2.10 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 email 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-Low Integrity-Low Availability-Low

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

The TPS EA number is 20180002.

3 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 for further guidance.

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

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3.1 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

3.2 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)	IdeaScale Gov (ISG)
Records Retention Schedule Number(s)	GRS 5.2 Transitory and Intermediary Records, Item 020 , Intermediary Records.
Approved Disposition Instructions	<p>Destroy upon verification of successful creation of the final document or file, or when no longer needed for business use, whichever is later.</p> <p>IdeaScale maintains system records in accordance with applicable Federal laws, Executive Orders, directives, policies, regulations, standards, and operational requirements.</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.	ISG-CSP owns the ISG system and is responsible for the retention of its data.
Disposition of Temporary Records Will the records/data or a composite be automatically or manually deleted once they reach their approved retention?	ISG-CSP owns the ISG system and is responsible for the retention of its data.
Disposition of Permanent Records Will the records be exported to an approved format and transferred to the National Archives based on approved retention and disposition instructions?	N/A

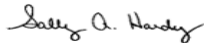
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If so, what formats will be used? NRC Transfer Guidance (Information and Records Management Guideline - IRMG)	
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4 Privacy Act Determination

Review Results		Action Items
<input checked="" 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.	A privacy impact assessment is required.
<input type="checkbox"/>	Other	See comments section below for further details.

Comments:

Reviewer's Name	Title
 Signed by Hardy, Sally on 07/24/24	Privacy Officer

I concur with this analysis.


 Signed by Nalabandian, Garo
 on 07/25/24

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