
U.S. Nuclear Regulatory Commission



Privacy Impact Assessment Child Care Subsidy Program Office of Chief Human Capital Officer

**Version 1.0
05/08/2025**

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 2.5 (03/2025)

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Document Revision History

Date	Version	PIA Name/Description	Author
05/28/2025	1.0	Child Care Subsidy/Initial Release	Brittnee Cheseman OCHCO/ADHROP/SAASB

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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: Childcare Subsidy Program.

Data Storage Location (i.e., Database Server, SharePoint, Cloud, Other Government Agency, Power Platform) FedRAMP certified Software as Service (SaaS) applications Salesforce and Box.com.

Date Submitted for review/approval: June 11, 2025.

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 project was created to enable NRC, under authority conferred by Public Law 106-58 and 5 CFR Part 792, to provide childcare subsidies to NRC employees to assist with the high cost of care. Collection of data required to administer the program is primarily through a FedRAMP-authorized SaaS application, Salesforce, used to collect, manage, and store information on participating families and their childcare providers. The contractor maintains a separate instance of Box.com, which is used to store and distribute reports derived from Salesforce data. Required reports are transmitted to the NRC from the contractor via email and are secured with password protection.

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

☐ PowerApps	☐ Artificial Intelligence (AI)
☐ Dashboard	☐ Public Website
☐ SharePoint	☐ Internal Website
☒ Cloud Service Provider	☐ Other
☐ Server/Database Design	

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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	
☒	New system/project
☐	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>
☐	Annual Review <i>If making minor edits to an existing system/project, briefly describe the changes below.</i>
☐	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.)

Role	Contact Information Name Office/Division/Branch Phone Number
Project Manager(s)	Primary: Brittnee Cheseman, HROP SAASB Email: Brittnee.Cheseman@nrc.gov Backup: Rickea Allen, HROP SAASB, Email: Rickea.Allen@nrc.gov
System Owner/Data Owner or Steward	OCHCO
ISSM	Brendan Cain OCHCO/HCAB 301-287-0552
Executive Sponsor	Richard Revzan Richard.Revzan@nrc.gov OCHCO/ADHROP 301-415-5140
Other	

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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
☒	Statute	Public Law 107-67, Sec. 630, permits Federal agencies, at their discretion, to use appropriated funds normally available for salaries to assist their lower income employees with childcare costs
☐	Executive Order	
☐	Federal Regulation	
☐	Memorandum of Understanding/Agreement	
☐	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).

The information will be used to provide childcare tuition assistance to NRC employees, as permitted by the statute.

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

Social Security numbers of NRC employees are required to accurately report taxable benefits on employees' W-2 forms at the end of each year and to ensure proper employee verification by the agency. The child's social security number is used to verify that a child is being claimed for the subsidy benefit by only one eligible parent (if both are employed by NRC) and as a differentiator when a child has the same name as another child or parent in the program, which is common. The child's social security number is also matched to the parent's income tax information to verify that the child is a dependent.

3 Characterization of the Information

In the table below, mark the categories of individuals for whom information is collected.

Category of individual	
☒	Federal employees
☐	Contractors
☐	Members of the Public (any individual other than a federal employee, consultant, or contractor)
☐	Licensees
☒	Other children and spouse/parent information

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](#).

Categories of Information			
☒	Name	☐	Resume or curriculum vitae
☒	Date of Birth	☐	Driver's License Number
☐	Country of Birth	☐	License Plate Number
☐	Citizenship	☐	Passport number
☐	Nationality	☐	Relatives Information
☐	Race	☐	Taxpayer Identification Number
☒	Home Address	☐	Credit/Debit Card Number
☒	Social Security number (Truncated or Partial)	☐	Medical/health information
☐	Sex (Male or Female)	☐	Alien Registration Number
☐	Ethnicity	☐	Professional/personal references
☒	Spouse Information	☐	Criminal History
☒	Personal e-mail address	☐	Biometric identifiers (facial images, fingerprints, iris scans)
☐	Personal Bank Account Number	☐	Emergency contact e.g., a third party to contact in case of an emergency
☒	Personal Mobile Number/Home Number	☐	Accommodation/disabilities information
☒	Marital Status	☐	Other: child's name, SSN, DOB, spouse employment info
☒	Children Information		
☐	Mother's Maiden Name		

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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).

FEEA Childcare Services, Inc. (FCCS) collects data for the project. Data is collected via secure online forms, as well as any OPM- and/or NRC-required paper forms, which are uploaded as part of the online forms, along with other required supporting documents. NRC employees may also mail or fax the required forms and supporting documentation directly to FCCS, however, submission this way is rare.

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

Form NRC 734: Application for the Child Care Subsidy Program.

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

The information is provided directly by NRC employees applying to participate or are participating in the program. Some of the childcare provider's information may be provided to the NRC employee by the childcare provider or in some instances directly to the contractor (FCCS) by the provider.

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

Online submissions are verified against supporting documents uploaded during the application, recertification, or change request process.

3.5 Will PII data be used in a test environment? If so, explain the rationale for this and how the PII information is protected.

No, PII is not used in the test environment.

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

Individuals may request corrections to their data through email, fax, phone, or online change request.

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).

The contractor, FEEA Childcare Services, Inc. (FCCS), owns and operates the system, with direct data access restricted to approved contractor personnel assigned to the project. NRC program personnel receive reports containing data extracted from the system.

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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.

The system operates independently and is not connected to any other NRC systems.

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

The system operates independently and is not connected to any NRC or non-NRC systems. While the contractor (FCCS) utilizes the system to administer similar programs for other federal agencies, no NRC data is shared with non-NRC partners.

If so, identify what agreements are in place with the external non-NRC partner or system in the table below.

Agreement Type	
☒	Contract: 31310023C0026
☐	License Provide License Information:
☐	Memorandum of Understanding Provide ADAMS ML number for MOU:
☐	Other
☐	None

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

Data is accessed through a web-based SaaS application. Each contractor staff member is assigned individual credentials, and multi-factor authentication (MFA) through Salesforce Authenticator or Google Authenticator is implemented to enhance security. No NRC employees directly access the information in the database.

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).

All data is encrypted both in transit and at rest. Additionally, any communication of data outside the system, such as reports provided to NRC program personnel, is encrypted to ensure security and confidentiality.

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

All data is securely stored in the cloud, ensuring availability, scalability, and compliance with applicable security standards.

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

Authorized contractor personnel can access the system secure web-based SaaS applications.

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4.8 Can the project be accessed by a contractor? Have the contractors completed an IT-II investigation? Do they possess an NRC badge?

The system is owned and operated by the contractor, and NRC personnel do not have direct access. Contractors have not undergone NRC investigations, do not hold NRC badges, and do not have access to NRC facilities.

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

The system inherits controls and safeguards from FedRAMP-authorized SaaS applications. Additional details constitute non-public, proprietary information belonging to the contractor.

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

The system does trace, track, or monitor individuals. However, system user actions are logged, and these logs are accessible to authorized personnel.

4.11 Define which FISMA boundary this project is part of.

N/A.

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

Authorization Status	
☐	Unknown
☒	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>
☐	In Progress provide the estimated date to receive an ATO. Estimated date:
☐	Yes Indicate the data impact levels (Low, Moderate, High, Undefined) approved by the Chief Information Security Officer (CISO) Confidentiality- Integrity- Availability-

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

N/A.

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5 Privacy Act Determination

5.1 Is the data collected retrieved by a personal identifier?

Mark the appropriate response.

Response	
☒	Yes, the PII is retrieved by a personal identifier (i.e., individual's name, address, SSN, or other unique number, etc.) List the identifiers that will be used to retrieve the information on the individual. Name, work and/or personal email, SSN
☐	No, the PII is not retrieved by a personal identifier. If no, explain how the data is retrieved from the project.

5.2 For all collections where the information is retrieved by a personal identifier, the Privacy Act requires that the agency publish a System of Record Notice (SORN) in the Federal Register. As per the Privacy Act of 1974, "the term 'system of records' means a group of any records under the control of any agency from which information is retrieved by the name of the individual or by some other personal identifier assigned to the individual.

Mark the appropriate response in the table below.

Response	
☒	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): NRC 12 – Child Care Subsidy Program Records
☐	SORN is in progress
☐	SORN needs to be created
☐	Unaware of an existing SORN
☐	No, this system is not a system of records and a SORN is not applicable.

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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	
☒	Privacy Act Statement NRC 734 Application for the Child Care Subsidy Program
☐	Not Applicable
☒	Unknown

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

Mandatory to get subsidy.

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.

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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?

☐	NUREG-0910, "NRC Comprehensive Records Disposition Schedule"
☒	NARA's General Records Schedules
☐	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)	Child Care Subsidy Program
Records Retention Schedule Number(s)	GRS 2.4, Item 010 (DAA-GRS-2016-0015-0015): Records used to calculate payroll, arrange paycheck deposit, and change previously issued paychecks.
Approved Disposition Instructions	GRS 2.4, Item 010: Temporary. Destroy when 3 years old, 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.	E-Concurrence
Disposition of Temporary Records Will the records/data or a composite be automatically or manually deleted once they reach their approved retention?	Child Care Subsidy Program will be assessed using the Records and Information (RIM) Certification process. The structured process will provide criteria aligned with the Suggested Rating to accurately

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	reflect the system's ability to support records management requirements.
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? If so, what formats will be used? NRC Transfer Guidance (Information and Records Management Guideline - IRMG)	

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?

Yes. The program requires collection of information about the employee's spouse (if applicable), the child(ren) who are receiving childcare services, and the childcare provider(s). All information collected is necessary for adjudicating eligibility for the program and/or providing the subsidy.

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: Child Care Subsidy Program

Submitting Office: OCHCO

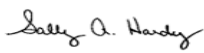
Privacy Officer Review

Review Results		Action Items
☐	This project/system does not contain PII .	No further action is necessary for Privacy.
☐	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.
☒	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 12 – Child Care Subsidy Program Records.

Please see last page for concerns with this program that should be addressed.

Reviewer's Name	Title
 Signed by Hardy, Sally on 09/10/25	Privacy Officer

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9 OMB Clearance Determination

NRC Clearance Officer Review

Review Results	
☐	No OMB clearance is needed.
☒	OMB clearance is needed.
☐	Currently has OMB Clearance. Clearance No. _____

Comments:

NRC Form 734 needs a clearance and is a potential violation of the Paperwork Reduction Act.
OPM Form 1644 should no longer be used since the OMB clearance expired 14 years ago.

Reviewer's Name	Title
 Signed by Cullison, David on 07/31/25	Agency Clearance Officer

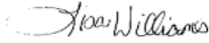
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10 Records Retention and Disposal Schedule Determination

Records Information Management Review

Review Results	
☐	No record schedule required.
☐	Additional information is needed to complete assessment.
☐	Needs to be scheduled.
☒	Existing records retention and disposition schedule covers the system - no modifications needed.

Comments:

Reviewer's Name	Title
 Signed by Dove, Marna on 09/04/25	Sr. Program Analyst, Electronic Records Manager
 Signed by Williams, Lisa on 08/26/25	Records and Information Management Specialist

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11 Review and Concurrence

Review Results	
☐	This project/system does not collect, maintain, or disseminate information in identifiable form.
☒	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 Nalabandian, Garo
on 09/22/25

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

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ADDITIONAL ACTION ITEMS/CONCERNS

Name of Project/System:	
Child Care Subsidy Program	
Date CISD received PIA for review:	Date CISD completed PIA review:
September 4, 2025	September 10, 2025
Action Items/Concerns: The NRC Child Care Subsidy Program has been in place for many years with an existing SORN. Originally, the program involved paper-based documents but has since migrated to use of an information system. However, the contractor system has not undergone NRC security assessments or authorizations, which presents possible risks. The recent PIA indicates that the contractors managing this program have not undergone any NRC personnel vetting or IT background checks. Since they are handling sensitive PII on behalf of the NRC—including Social Security Numbers — the agency remains responsible for ensuring compliance with federal privacy requirements. In order to effectively capture these risks and apply appropriate controls, the contractor system will need to navigate the authorization to use process and enforce the appropriate controls.	