
U.S. Nuclear Regulatory Commission



Privacy Impact Assessment Financial Management Systems (FMS) HCM Cloud for Time and Labor System SFTP Server (HCMTL SFTP)

Office of the Chief Financial Officer (OCFO)

**Version 1.2
08/19/2025**

Financial Management Systems (FMS) – HCM Cloud for Time and Labor System SFTP Server (HCMTL SFTP)	Version 1.2
Privacy Impact Assessment	08/19/2025

Document Revision History

Date	Version	PIA Name/Description	Author
08/19/2025	1.2	FMS HCMTL SFTP PIA annual update and transferred to new template	OCFO Oasis Systems, LLC
08/01/2025	Draft of 1.2	FMS HCMTL SFTP PIA Draft - Annual Update – New Template	OCFO Oasis Systems, LLC
08/27/2024	1.1	FMS HCMTL SFTP PIA Annual Update – New Template	OCFO Oasis Systems, LLC
08/16/2024	Draft of 1.1	FMS HCMTL SFTP PIA Annual Update – New Template	OCFO Oasis Systems, LLC
6/22/2023	1.0	FMS HCMTL SFTP PIA Initial Release.	OCFO Oasis Systems, LLC
5/25/2023	DRAFT	FMS HCMTL SFTP PIA Draft Release.	OCFO Oasis Systems, LLC

Financial Management Systems (FMS) – HCM Cloud for Time and Labor System SFTP Server (HCMTL SFTP)	Version 1.2
Privacy Impact Assessment	08/19/2025

Table of Contents

1	Description	1
2	Authorities and Other Requirements	3
3	Characterization of the Information	4
4	Data Security	6
5	Privacy Act Determination	8
6	Records and Information Management-Retention and Disposal	10
7	Paperwork Reduction Act	13
8	Privacy Act Determination	14
9	OMB Clearance Determination	15
10	Records Retention and Disposal Schedule Determination	16
11	Review and Concurrence	17

Financial Management Systems (FMS) – HCM Cloud for Time and Labor System SFTP Server (HCMTL SFTP)	Version 1.2
Privacy Impact Assessment	08/19/2025

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: Financial Management Systems (FMS) – HCM Cloud for Time and Labor System (HCMTL SFTP).

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

Date Submitted for review/approval: August 19, 2025.

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.

FMS is owned and managed by the Office of the Chief Financial Officer (OCFO). FMS provides the framework for managing cybersecurity compliance for OCFO financial services and systems used by the Nuclear Regulatory Commission (NRC). FMS is an umbrella system that is comprised of subsystems and services that support mission and business functions that OCFO provides for the agency. The HCMTL SFTP server operates as a service under FMS that facilitates file transfer between NRC and the Oracle Human Capital Management (HCM) Cloud for HCMTL.

The Red Hat server facilitates data transfer with NRC systems (Financial Accounting and Integrated Management Information System (FAIMIS), Budget Formulation System (BFS), and Cost Activity Code System (CACS), the Department of the Interior’s (DOI) Federal Personnel Payroll System (FPPS), and Oracle HCM Cloud in order to support HCMTL employee activity based hour recording, payroll management, and fee billing.

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

<input type="checkbox"/> PowerApps	<input type="checkbox"/> Artificial Intelligence (AI)
<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	<input type="checkbox"/> Other
<input checked="" type="checkbox"/> Server/Database Design	

Financial Management Systems (FMS) – HCM Cloud for Time and Labor System SFTP Server (HCMTL SFTP)	Version 1.2
Privacy Impact Assessment	08/19/2025

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>
<input checked="" type="checkbox"/>	Annual Review <i>If making minor edits to an existing system/project, briefly describe the changes below.</i>
<input type="checkbox"/>	Other (explain)

1.3 Points of Contact:

Role	Contact Information Name Office/Division/Branch Phone Number
Project Manager(s)	Abby Olarte OCFO/DOC/FSB 301-415-6288
System Owner/Data Owner or Steward	Chris Carroll OCFO 301-415-1613
ISSM	John Howerton OCFO/DOC/FSB 301-415-8170
Executive Sponsor	Chris Carroll OCFO 301-415-1613
Other	

Financial Management Systems (FMS) – HCM Cloud for Time and Labor System SFTP Server (HCMTL SFTP)	Version 1.2
Privacy Impact Assessment	08/19/2025

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	5 U.S.C. 6334; 5 U.S.C. Part III, Subpart D; 31 U.S.C. 716; 31 U.S.C. Chapters 35 and 37
<input type="checkbox"/>	Executive Order	
<input checked="" type="checkbox"/>	Federal Regulation	26 Code of Federation Regulations (CFR) 31.6011(b)(2), 31.6109–1
<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).

The SFTP server facilitates data transfer with NRC systems (HCMTL, FAIMIS, BFS, and CACS), the DOI FPPS, and Oracle HCM Cloud in order to support HCMTL employee activity-based hour recording, payroll management, and fee billing.

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

General employee information (first name, last name, SSN), salaries, and benefits, leave balances, payroll data, time and attendance data, and activity-based work hours to support payroll and Human Resources (HR) activities.

Financial Management Systems (FMS) – HCM Cloud for Time and Labor System SFTP Server (HCMTL SFTP)	Version 1.2
Privacy Impact Assessment	08/19/2025

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

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			
<input checked="" type="checkbox"/>	Name	<input type="checkbox"/>	Resume or curriculum vitae
<input checked="" 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 checked="" type="checkbox"/>	Social Security number (Truncated or Partial)	<input type="checkbox"/>	Medical/health information
<input type="checkbox"/>	Sex (Male or Female)	<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 type="checkbox"/>	Emergency contact e.g., a third party to contact in case of an emergency
<input type="checkbox"/>	Personal Mobile Number/Home Number	<input type="checkbox"/>	Accommodation/disabilities information
<input type="checkbox"/>	Marital Status	<input type="checkbox"/>	Other
<input type="checkbox"/>	Children Information		
<input type="checkbox"/>	Mother's Maiden Name		

Financial Management Systems (FMS) – HCM Cloud for Time and Labor System SFTP Server (HCMTL SFTP)	Version 1.2
Privacy Impact Assessment	08/19/2025

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).

All data in the SFTP server comes from files delivered to the server via interface, collected from the respective system (HCMTL, FAIMIS, FPPS, etc.) and their corresponding files are uploaded to the server. After which point, the files are transported to their respective applications, servers, or file locations.

The data is transferred via batch file interfaces. All file transfers between Oracle HCM Cloud and the SFTP server occur through a VPN tunnel.

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.

N/A.

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

Data is provided by NRC systems (HCMTL, FAIMIS, BFS, and CACS), DOI FPPS, and Oracle HCM Cloud.

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

Data accuracy is verified on the respective systems on which the data is originally collected from the individual (Oracle HCM Cloud; FPPS via Employee Express, Monster, or the Entrance on Duty System (EODS)). Subsequent verification can be done via Employee Express by reviewing the bi-weekly Earning and Leave Statement.

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.

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

Data stored and processed by the server is not collected directly from the subject individual. All data in the SFTP server is collected from the respective system and their corresponding files are uploaded to the server. It is the responsibility of the source systems to provide individuals the ability to correct inaccurate or erroneous information.

Financial Management Systems (FMS) – HCM Cloud for Time and Labor System SFTP Server (HCMTL SFTP)	Version 1.2
Privacy Impact Assessment	08/19/2025

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).

Server access is restricted to Office of the Chief Information Officer (OCIO) administrators and a limited number of Office of the Chief Human Capital Officer (OCHCO) HR personnel.

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.

All data in the SFTP server comes from files delivered to the server via interface. The SFTP server maintains files from the following NRC systems:

- CACS – employee Cost Activity Code (CAC), Docket, Enterprise Project Identifier (EPID) assignments.
- Oracle HCM Cloud – hours information with missing PA codes, payroll information for GL postings, cost accounting information, NRC employee addresses and bank account data for travel reimbursement (for FAIMIS); time and absence information (for DOI FPPS); salary and benefits information (for BFS); and employee CAC/Docket/EPID assignments, time data, reported hours, and approvers' data and pay period dates information (for CACS).
- DOI FPPS – department, grade, and position data; employee demographic, employment, and supervisory information; salary data (base salary); payroll assigned to each employee to drive pay period information; leave balances, and cost data.

4.3 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 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 checked="" type="checkbox"/>	Other Interconnection Security Agreement Provide ADAMS ML number for ISA: ML21265A519 Service Level Agreement Provide ADAMS ML number for SLA: ML22277A714
<input type="checkbox"/>	None

Financial Management Systems (FMS) – HCM Cloud for Time and Labor System SFTP Server (HCMTL SFTP)	Version 1.2
Privacy Impact Assessment	08/19/2025

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

Authorized users (system administrators and a limited number of OCHCO personnel) are granted SSH/SFTP access. PIV cards are used to authenticate to the NRC network, then username and password authentication is used to access accounts on the server. Sessions time out after 5 minutes of inactivity, and user accounts expire every 60 days. Role based training is required for privileged accounts.

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 in the SFTP server is collected from the respective system and their corresponding files are uploaded to the server. After which point, the files are transported to their respective applications, servers, or file locations.

The data is transferred via batch file interfaces. All file transfers between Oracle HCM Cloud and the SFTP server occur through a VPN tunnel.

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

The HCMTL SFTP server is hosted at NRC HQ.

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

N/A.

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

No.

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

Auditing of all user accounts logon activities and events are enabled. Audit logs are forwarded to Splunk and reviewed daily.

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.

The HCMTL SFTP server operates as a service under the FMS FISMA boundary.

Financial Management Systems (FMS) – HCM Cloud for Time and Labor System SFTP Server (HCMTL SFTP)	Version 1.2
Privacy Impact Assessment	08/19/2025

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:
<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.

The FMS HCMTL SFTP EA number is 20190012.

5 Privacy Act Determination

5.1 Is the data collected retrieved by a personal identifier?

Mark the appropriate response.

Response	
<input checked="" type="checkbox"/>	<p>Yes, the PII is retrieved by a personal identifier (i.e., individual's name, address, SSN, or other unique number, etc.)</p> <p>List the identifiers that will be used to retrieve the information on the individual.</p> <p>Data will not generally be retrieved at the individual employee level except in cases of data quality assurance (QA) or troubleshooting. In those cases, Employee ID will usually be used; however, name, SSN, bank account number, etc. can also be used.</p>
<input type="checkbox"/>	<p>No, the PII is not retrieved by a personal identifier.</p> <p>If no, explain how the data is retrieved from the project.</p>

Financial Management Systems (FMS) – HCM Cloud for Time and Labor System SFTP Server (HCMTL SFTP)	Version 1.2
Privacy Impact Assessment	08/19/2025

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>Yes, this system is covered by an existing SORN. (See existing SORNs: https://www.nrc.gov/reading-rm/foia/privacy-systems.html)</p> <p>Provide the SORN name, number, (List all SORNs that apply):</p> <p>US Federal Government-wide SORN OPM/GOVT-1 – “General Personnel Records”</p>
<input type="checkbox"/>	SORN is in progress
<input type="checkbox"/>	SORN needs to be created
<input type="checkbox"/>	Unaware of an existing SORN
<input type="checkbox"/>	No, this system is not a system of records and a SORN is not applicable.

5.3 When an individual is asked to provide personal data (i.e., form, webpage, survey), is a Privacy Act Statement (PAS) provided?

A Privacy Act Statement is a disclosure statement required to appear on documents used by agencies when an individual is asked to provide personal data. It is required for any forms, surveys, or other documents, including electronic forms, used to solicit personal information from individuals that will be maintained in a system of records.

Mark the appropriate response.

Options	
<input type="checkbox"/>	Privacy Act Statement
<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?

Data stored and processed by the server is not collected directly from the subject individual. All data in the SFTP server is collected from the respective system and their corresponding files are uploaded to the server. It is the responsibility of the source systems to provide notice to individuals whether PII disclosure is mandatory or voluntary.

Financial Management Systems (FMS) – HCM Cloud for Time and Labor System SFTP Server (HCMTL SFTP)	Version 1.2
Privacy Impact Assessment	08/19/2025

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 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

Financial Management Systems (FMS) – HCM Cloud for Time and Labor System SFTP Server (HCMTL SFTP)	Version 1.2
Privacy Impact Assessment	08/19/2025

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)	FMS – HCMTL SFTP
Records Retention Schedule Number(s)	<u>See table below for records schedules and retention details:</u>
Approved Disposition Instructions	
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.	Records retention and disposition on the server is currently a manual process. FMS – HCMTL SFTP will be assessed using the Records and Information (RIM) Certification process. The structured process will provide criteria aligned with the Suggested Rating to accurately reflect the system's ability to support records management requirements.
Disposition of Temporary Records Will the records/data or a composite be automatically or manually deleted once they reach their approved retention?	Files are automatically deleted after successful transfer from the intermediary server to the destination system. FMS – HCMTL SFTP will be assessed using the Records and Information (RIM) Certification process. The structured process will provide criteria aligned with the Suggested Rating to accurately 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? <u>NRC Transfer Guidance (Information and Records Management Guideline - IRMG)</u>	No

Financial Management Systems (FMS) – HCM Cloud for Time and Labor System SFTP Server (HCMTL SFTP)	Version 1.2
Privacy Impact Assessment	08/19/2025

Records Retention Schedule Number(s)	Disposition
<u>GRS 2.4 Item 010: Records used to calculate payroll, arrange paycheck deposit, and change previously issued paychecks.</u>	Temporary. Destroy 3 years after paying agency or payroll processor validates data, but longer retention is authorized if required for business use.
<u>GRS 2.4 Item 030: Time and attendance records.</u>	Temporary. Destroy when 3 years old, but longer retention is authorized if required for business use.
<u>GRS 2.4 Item 040: Agency payroll record for each pay period.</u>	Temporary. Destroy when 56 years old.
<u>GRS 2.4 Item 050: Wage and tax statements.</u>	Temporary. Destroy when 4 years old, but longer retention is authorized if required for business use
<u>GRS 2.4 Item 060: Payroll program administrative records. Administrative correspondence between agency and payroll processor, and system reports used for agency workload and or personnel management purposes.</u>	Temporary. Destroy when 2 years old, but longer retention is authorized if required for business use.
<u>GRS 2.4 Item 061: Payroll program administrative records. Payroll system reports providing fiscal information on agency payroll.</u>	Temporary. Destroy when 3 years old or after Government Accountability Office (GAO) audit, but longer retention is authorized if required for business use.

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.

Financial Management Systems (FMS) – HCM Cloud for Time and Labor System SFTP Server (HCMTL SFTP)	Version 1.2
Privacy Impact Assessment	08/19/2025

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.

Financial Management Systems (FMS) – HCM Cloud for Time and Labor System SFTP Server (HCMTL SFTP)	Version 1.2
Privacy Impact Assessment	08/19/2025

8 Privacy Act Determination

Project/System Name: Financial Management Systems (FMS) HCM Cloud for Time and Labor System SFTP Server (HCMTL SFTP)

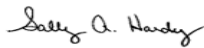
Submitting Office: OCFO

Privacy Officer Review

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

Comments:

Covered by Government-wide SORN OPM/GOVT-1 – General Personnel Records.

Reviewer's Name	Title
 Signed by Hardy, Sally on 11/17/25	Privacy Officer

Financial Management Systems (FMS) – HCM Cloud for Time and Labor System SFTP Server (HCMTL SFTP)	Version 1.2
Privacy Impact Assessment	08/19/2025


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:

The subject server is not used to collect information; no OMB Clearance is needed.

Reviewer's Name	Title
 Signed by Cullison, David on 09/02/25	Agency Clearance Officer


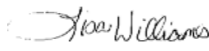
Financial Management Systems (FMS) – HCM Cloud for Time and Labor System SFTP Server (HCMTL SFTP)	Version 1.2
Privacy Impact Assessment	08/19/2025

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 09/30/25	Sr. Program Analyst, Electronic Records Manager
 Signed by Williams, Lisa on 09/30/25	Records and Information Management Specialist

Financial Management Systems (FMS) – HCM Cloud for Time and Labor System SFTP Server (HCMTL SFTP)	Version 1.2
Privacy Impact Assessment	08/19/2025

11 Review and Concurrence

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

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



Signed by Nalabandian, Garo
on 11/18/25

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

Financial Management Systems (FMS) – HCM Cloud for Time and Labor System SFTP Server (HCMTL SFTP)	Version 1.2
Privacy Impact Assessment	08/19/2025

ADDITIONAL ACTION ITEMS/CONCERNS

Name of Project/System: Financial Management Systems (FMS) HCM Cloud for Time and Labor System SFTP Server (HCMTL SFTP)	
Date CISD received PIA for review: September 30, 2025	Date CISD completed PIA review: November 17, 2025
Action Items/Concerns: Add'l action items / concerns" section: Please ensure review and update of this PIA as appropriate, if there are any resulting changes from deployment of the NEXUS power application.	