
U.S. Nuclear Regulatory Commission



**Privacy Impact Assessment
Mind Your Business, Inc. (MYB) SharePoint Site
Office of Small Business and Civil Rights (SBCR)**

**Version 1.0
08/27/2025**

Template Version 2.5 (03/2025)

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Privacy Impact Assessment	08/27/2025

Document Revision History

Date	Version	PIA Name/Description	Author
08/27/2025	1.0	MYB SharePoint Site	OCIO, SBCR Oasis Systems, LLC
06/18/2025	DRAFT of 1.0	Mind Your Business, Inc. (MYB) SharePoint Site – Draft Release	OCIO, SBCR Oasis Systems, LLC

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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: Mind Your Business, Inc. (MYB) SharePoint Site

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

Date Submitted for review/approval: 08/27/2025

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.

The Office of Small Business and Civil Rights created a SharePoint site, “Mind Your Business, Inc.” for storing the Equal Employment Opportunity (EEO) complaint information that is collected and generated during investigation and resolution of EEO complaints. This SharePoint site is utilized by the authorized staff of Mind Your Business, Inc. (MYB) company that provides non-personnel services to SBCR for investigation and resolution of EEO complaints. MYB provides the following EEO services to SBCR: counseling, mediation, investigation, and document processing services (drafting acceptance/dismissal letters, final agency decisions, or other related case processing documents).

SBCR places the EEO case files on the MYB SharePoint site for MYB to perform their services. The MYB staff uses the SharePoint site to view the case files and provide deliverables to SBCR.

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 checked="" type="checkbox"/> SharePoint	<input type="checkbox"/> Internal Website
<input type="checkbox"/> Cloud Service Provider	<input type="checkbox"/> Other
<input type="checkbox"/> 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	
<input checked="" type="checkbox"/>	New system/project This project replaced the solution previously used by MYB outside of the NRC network.
<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 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)	Meredith Neubauer Office of Small Business & Civil Rights (SBCR) / Civil Rights Program (CRP) 301-415-0587
System Owner/Data Owner or Steward	Larniece McKoy Moore Office of Small Business & Civil Rights (SBCR) / Civil Rights Program (CRP) 301-415-1942
ISSM	Natalya Bobryakova Office of the Chief Information Officer (OCIO) / Cyber and Information Security Division (CISD) / Information Assurance and Oversight Branch (IAOB) 301-287-0671
Executive Sponsor	
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
<input checked="" type="checkbox"/>	Statute	Notification and Federal Antidiscrimination and Retaliation Act of 2002 (No FEAR Act), as amended
<input type="checkbox"/>	Executive Order	
<input checked="" type="checkbox"/>	Federal Regulation	The U.S. Equal Employment Opportunity Commission (EEOC) regulations at Title 29 of the Code of Federal Regulations (29 CFR) Part 1614, "Federal Sector Equal Employment Opportunity"
<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).

SBCR uses the MYB SharePoint site to provide EEO case files to MYB for performing EEO services and to retrieve the documents developed by MYB, such as the Counseling Report, Report of Mediation, Report of Investigation, and other required documents.

The information on the MYB SharePoint site is used by MYB staff, counselors, mediators, and investigators to perform requested EEO services that include counseling, mediation, investigation, and document processing (drafting formal documents and other related case processing documents).

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

N/A.

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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"/>	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 checked="" 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 checked="" type="checkbox"/>	Nationality	<input type="checkbox"/>	Relatives Information
<input checked="" 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 checked="" type="checkbox"/>	Sex (Male or Female)	<input type="checkbox"/>	Alien Registration Number
<input checked="" type="checkbox"/>	Ethnicity	<input checked="" type="checkbox"/>	Professional/personal references
<input type="checkbox"/>	Spouse Information	<input type="checkbox"/>	Criminal History
<input checked="" type="checkbox"/>	Personal e-mail address	<input type="checkbox"/>	Biometric identifiers (facial images, fingerprints, iris scans)
<input type="checkbox"/>	Personal Bank Account Number	<input type="checkbox"/>	Emergency contact e.g., a third party to

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Categories of Information			
			contact in case of an emergency
<input checked="" type="checkbox"/>	Personal Mobile Number/Home Number	<input checked="" type="checkbox"/>	Accommodation/disabilities information
<input checked="" type="checkbox"/>	Marital Status	<input checked="" type="checkbox"/>	Other: grade/step/series/salary, job title, phone numbers, color, religion, prior EEO activity.
<input type="checkbox"/>	Children Information	<input checked="" type="checkbox"/>	
<input type="checkbox"/>	Mother's Maiden Name	<input checked="" type="checkbox"/>	

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).

The information is collected directly from subject individuals (i.e., aggrieved individuals and/or complainants) during the complaint filing and initial processing stages. Please see the Entellitrak Equal Employment Opportunity (ETK-EEO) PIA for more information, [Entellitrak Equal Employment Opportunity \(ETK EEO\) PIA \(ML25077A059\)](#). The data for specific cases that need further investigation is provided by the SBCR staff to MYB via SharePoint.

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.

NRC Form 646, Formal Discrimination Complaint (Approved by OMB: No. 3150-0255, expires 01/31/2026).

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

The initial information is provided by the subject individual. SBCR staff provide the information for case investigation purposes to MYB via SharePoint.

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

All initial information is self-reported by the subject individual through the ETK EEO eFile system or directly to SBCR staff. SBCR or MYB do not question the accuracy of the initial information reported by the subject individual unless there is a reason to do so.

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 a test environment.

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

Complainants have access to the eFile application (<https://nrc-efile.entellitrak.com>) where they can modify their own information. Complainants can also provide their updated information directly to SBCR staff. SBCR staff provide the updated information to MYB.

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).

SBCR authorized staff and MYB authorized staff (EEO Program Manager, Assistant Project Manager, EEO Assistant, and sub-contractors) have access to the data.

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.

SBCR staff downloads information from the ETK-EEO application and manually uploads the information to SharePoint for access by MYB. There are no direct connections or automated solutions to share information between ETK-EEO and MYB SharePoint.

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

MYB employs sub-contractors to perform EEO services for SBCR.

The MYB staff providing the services to SBCR may receive the information from the external non-NRC partners during the EEO complaint investigation.

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

Agreement Type	
<input checked="" type="checkbox"/>	Contract Provide Contract Number: NRC Contract No. 31310022C0009, "Equal Employment Opportunity (EEO) Multi-Services"
<input type="checkbox"/>	License Provide License Information:
<input type="checkbox"/>	Memorandum of Understanding Provide ADAMS ML number for MOU:
<input type="checkbox"/>	Other
<input type="checkbox"/>	None

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

MYB staff use the NRC Azure Virtual Desktop (AVD) platform to perform their work on the NRC network and to access the MYB SharePoint site. MYB staff access AVD from outside the NRC network via the NRC Identity, Credential, and Access Management (ICAM) Authentication Gateway by providing their NRC network credentials and One-time Password (OTP). SBCR assigns access permissions on the MYB SharePoint site, so the users have only the minimum level of access necessary to perform their services. The ICAM Authentication Gateway authentication and SharePoint authorization mechanisms prevent misuse of data.

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).

The MYB SharePoint site data is not transmitted to/from outside of NRC network.

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

Data is stored within the NRC SharePoint site.

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?

Yes. MYB staff (personnel and sub-contractors) who access the NRC data have been investigated and approved for the NRC IT Level II access authorization. MYB personnel does not possess an NRC badge.

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

Only authorized MYB staff have access to data. MYB staff have access to data only for the cases assigned to them. Updates to the documents on the site are audited by tracking the following events: Modified: date/time, Modified By: username.

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 NRC SharePoint is part of the Information Technology Infrastructure (ITI) Azure Cloud Services (ACS) FISMA boundary.

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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. ITI-ACS has an ongoing authorization. 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.

20090005

5 Privacy Act Determination

5.1 Is the data collected retrieved by a personal identifier?

Mark the appropriate response.

Response	
<input checked="" type="checkbox"/>	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. The data on the MYB SharePoint site is retrieved by a case number.
<input type="checkbox"/>	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	
<input checked="" type="checkbox"/>	Yes, this system is covered by an existing SORN. (See existing SORNs: https://www.nrc.gov/reading-rm/foia/privacy-systems.html) Provide the SORN name, number, (List all SORNs that apply): Government-wide SORN: <u>EEOC/GOVT-1 (Equal Employment Opportunity in the Federal Government Complaint and Appeal Records)</u>
<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 checked="" type="checkbox"/>	Privacy Act Statement NRC Form 646 provides a Privacy Act Statement. Note: This does not apply to the services that MYB provides to SBCR, due to MYB noninvolvement in the initial collection of data.
<input type="checkbox"/>	Not Applicable
<input type="checkbox"/>	Unknown

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

Providing PII is mandatory for the EEO complaint cases that involve discrimination (e.g., date of birth for age discrimination cases). Please see the ETK-EEO PIA for more information, [Entellitrac Equal Employment Opportunity \(ETK EEO\) PIA \(ML25077A059\)](#).

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.

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6.1 Does this project map to an applicable retention schedule in NRC's Comprehensive Records Disposition Schedule (NUREG-0910), or NARA's General Records Schedules?

<input type="checkbox"/>	NUREG-0910, "NRC Comprehensive Records Disposition Schedule
<input checked="" type="checkbox"/>	NARA's General Records Schedules
<input type="checkbox"/>	Unscheduled

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

System Name (include sub-systems, platforms, or other locations where the same data resides)	MYB SharePoint Site
Records Retention Schedule Number(s)	<p>GRS 2.3 item 110, EEO discrimination complaint case files. Informal process.</p> <p>GRS 2.3 item 111, EEO discrimination complaint case files. Formal process.</p> <p>GRS 2.3 item 120, Records documenting contractor compliance with EEO regulation.</p> <p>GRS 5.7 item 050, Mandatory reports to external federal entities regarding administrative activities.</p>
Approved Disposition Instructions	<p>GRS 2.3 item 110 - Disposition instruction: Temporary. Destroy 3 years after resolution of case, but longer retention is authorized if required for business use.</p> <p>GRS 2.3 item 111 - Disposition instruction: Temporary. Destroy 7 years after resolution of case, but longer retention is authorized if required for business use.</p> <p>GRS item 120 – Temporary. Destroy when 7 years old, but longer retention is authorized if required for business use.</p> <p>GRS 5.7 item 050 - Temporary. Destroy 6 years after report submission or oversight entity notice of approval, as appropriate, but longer retention is authorized if required for business use.</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	MYB SharePoint Site 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

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system(s) to support records accessibility, reliability, integrity, and disposition.	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?	Manually MYB SharePoint Site 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</u> <u>(Information and Records Management Guideline - IRMG)</u>	N/A

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, information can be collected from anyone submitting a claim such as a contractor, former employee, or job applicant (See the ETK-EEO PIA for more information, [Entellitrap Equal Employment Opportunity \(ETK EEO\) PIA\(ML25077A059\)](#)).

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?

An OMB clearance is needed for the initial collection of information by ETK-EEO. (See the ETK-EEO PIA for more information, [Entellitrap Equal Employment Opportunity \(ETK EEO\)](#)

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[PIA\(ML25077A059\)](#). However, this does not apply to MYB services, as MYB does not collect information.

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>.

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8 Privacy Act Determination

Project/System Name: [Mind Your Business, Inc. \(MYB\)](#)

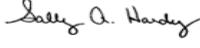
Submitting Office: [Office of Small Business & Civil Rights \(SBCR\)](#)

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: EEOC/GOVT-1 (Equal Employment Opportunity in the Federal Government Complaint and Appeal Records)

Reviewer's Name	Title
 Signed by Hardy, Sally on 11/18/25	Privacy Officer

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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:

MYB is not used to collect information.

Reviewer's Name	Title
 Signed by Cullison, David on 09/12/25	Agency Clearance Officer

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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 09/11/25	Sr. Program Analyst, Electronic Records Manager
 Signed by Williams, Lisa on 10/04/25	Records and Information Management Specialist

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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 11/20/25

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:	
Mind Your Business, Inc (MYB)	
Date CISD received PIA for review:	Date CISD completed PIA review:
August 27, 2025	November 17, 2025
Action Items/Concerns:	