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U.S. Nuclear Regulatory Commission

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**Privacy Impact Assessment  
HCM Cloud for Time and Labor System (HCMTL)  
Office of the Chief Financial Officer (OCFO)**

**Version 1.0  
8/23/2023**

HCM Cloud for Time and Labor System (HCMTL)	Version 1.0
Privacy Impact Assessment	8/23/2023

## Document Revision History

Date	Version	PIA Name/Description	Author
8/23/2023	1.0	HCMTL PIA Initial Release.	OCFO Oasis Systems, LLC
7/21/2023	DRAFT	HCMTL PIA Draft Release.	OCFO 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:** HCM Cloud for Time and Labor System (HCMTL).

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

**Date Submitted for review/approval:** August 23, 2023.

## 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.**

HCMTL captures time, attendance, and labor data, leveraging the Oracle Human Capital Management (HCM) cloud application. The HCM Time & Labor (T&L) and Absence modules require all employees to be self-reporters and to enter time taken for vacation, sick leave, jury duty, etc. It also tracks monthly leave accrual (vacation and sick hours earned each month vs. hours taken).

HCMTL supports recording of employee activity-based hours to be used primarily for payroll and fee billing through the following modules:

- Time and Labor – NRC employees can report, manage, and process time using the Time and Labor module. Time data can be transferred to global payroll, project costing, and external applications.
- Absence Management – NRC employees can schedule and approve absences, maintain absences, and analyze absence data using Absence Management.

The purpose of HCMTL is to collect time and attendance data for payroll processing, formulating and executing budgets, operations planning, workload planning, labor data reporting, performance monitoring, reporting on resource expenditures, billing NRC licensees, and managing costs associated with collecting fees.

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

<input type="checkbox"/> PowerApps	<input type="checkbox"/> Public Website
<input type="checkbox"/> Dashboard	<input checked="" type="checkbox"/> Internal Website
<input type="checkbox"/> SharePoint	<input type="checkbox"/> None
<input type="checkbox"/> Other:	

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**1.2 Does this privacy impact assessment (PIA) support a proposed new project, proposed modification to an existing project, or other situation? Select options that best apply in table below.**

Mark appropriate response.

Status Options	
<input type="checkbox"/>	New system/project
<input checked="" type="checkbox"/>	Modification to an existing system/project. <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> The HCMTL system was renamed, previously known as the “Human Resources Management System – Cloud (HRMS-C)”, as documented in the previous PIA. ADAMS ML: ML21025A267
<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:**

	Project Manager	System Owner/Data Owner/Steward	ISSO	Business Project Manager	Technical Project Manager	Executive Sponsor
<b>Name</b>	Abby Olarte	Howard Osborne	John Howerton	Erikka LeGrand	N/A	Howard Osborne
<b>Office/ Division/ Branch</b>	OCFO/ DOC/FSB	OCFO	OCFO/ DOC/FSB	OCFO/ DOC/FSOB	N/A	OCFO
<b>Telephone</b>	301-415-6288	N/A	301-415-8170	301-415-7748	N/A	N/A

## 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"/>	<b>Statute</b>	5 United States Code (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"/>	<b>Executive Order</b>	
<input checked="" type="checkbox"/>	<b>Federal Regulation</b>	26 Code of Federation Regulations (CFR) 31.6011(b)(2), 31.6109–1.
<input type="checkbox"/>	<b>Memorandum of Understanding/</b>	

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	<b>Agreement</b>	
<input type="checkbox"/>	<b>Other (summarize and provide a copy of relevant portion)</b>	

**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*).**

Information in the system is used for data transmissions to the Department of the Interior (DOI) for paycheck and leave balances calculations, license fees billings, updates to the agency's core financial system, financial reporting, project management, salary and benefits modeling, cost accounting modeling, and strategic workforce planning.

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

HCMTL uses employee information (first name, last name, SSN, etc.) to support management of salaries and benefits, leave balances, payroll data, time and attendance data, and activity-based work hours.

### 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"/>	<b>Other:</b>

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In the table below, is a list of the most common types of PII collected. Mark all PII that is collected and stored by the project/system. If there is additional PII not defined in the table below, a comprehensive listing of PII is provided for further reference in ADAMS at the following link: [PII Reference Table 2023](#).

Categories of Information			
<input checked="" type="checkbox"/>	Name	<input 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 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"/>	Gender	<input type="checkbox"/>	Alien Registration Number
<input type="checkbox"/>	Ethnicity	<input type="checkbox"/>	Professional/personal references
<input type="checkbox"/>	Spouse Information	<input type="checkbox"/>	Criminal History
<input type="checkbox"/>	Personal e-mail address	<input type="checkbox"/>	Biometric identifiers (facial images, fingerprints, iris scans)
<input checked="" type="checkbox"/>	Personal Bank Account Number	<input type="checkbox"/>	Emergency contact (e.g., a third party to contact in case of an emergency)
<input type="checkbox"/>	Personal Mobile Number	<input type="checkbox"/>	Accommodation/disabilities information
<input type="checkbox"/>	Marital Status	<input type="checkbox"/>	<b>Other:</b>
<input type="checkbox"/>	Children Information		
<input type="checkbox"/>	Mother's Maiden Name		

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

Employee time and attendance information is collected directly from the individual. Employee information (name, DOB, SSN, etc.), salary and benefits, and payroll information comes from DOI's Federal Personnel Payroll System (FPPS) via daily file transfer to an intermediary file server.

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

N/A.

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

Employee timesheet data is collected directly from the individual; and employee information is collected from existing NRC systems and DOI FPPS, shared through an intermediary server.

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

Employee time and attendance data is verified through OCFO reconciliations, SF-52s, and Earnings and Leave statements. There are no data validations for employee information from DOI FPPS; HCMTL assumes that incoming data is accurate.

**3.5 Will PII data be used in a test environment? If so, explain the rationale.**

Yes, the HCMTL test environment uses PII to validate system enhancements and corrections.

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

HCMTL does not collect PII directly from the subject individual, it is provided by file transfer from DOI FPPS to an intermediary server. If employee information is inaccurate, this can be corrected by the subject individual through the Employee Express self-service portal, or by contacting an NRC Office of the Chief Human Capital Officer (OCHCO) Human Resource (HR) specialist.

## **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).**

All NRC Offices have access to the system for the purposes of employee time entry, approvals, and reporting of activities. Access within the system is limited based on roles and responsibilities. There are need-to-know restrictions in place for access to PII required to perform official duties.

**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.**

HCMTL shares information with the following NRC systems:

- Budget Formulation System (BFS) – HCMTL sends employee payroll information to BFS.
- Financial Accounting and Integrated Management Information System (FAIMIS) – HCMTL sends employee hour and payroll data to FAIMIS.
- Cost Activity Code System (CACS) – HCMTL sends employee hour data to CACS. CACS provides employee staff assignment information to HCMTL.

All information/file sharing between HCMTL and NRC systems use an intermediary server.

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

A file from DOI's FPPS contains employee information, salary and benefits, leave balances, and payroll information, delivered to an intermediary server.



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**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

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

NRC personnel access HCMTL from the NRC network, using Information Technology Infrastructure (ITI) Identity, Credential, and Access Management (ICAM) for Single Sign-On (SSO). User access and activity is monitored by service administrators. Audit trails track user access by User ID with date and time stamps, and logs are reviewed by the assigned Information System Security Officer (ISSO) designees.

**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 data to and from HCMTL is transmitted to other NRC systems via batch file interfaces, using an intermediary server. All communications are encrypted, employing Tectia SSH and FIPS-mode.

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

Data is stored in the cloud and temporarily on the intermediary server.

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

HCMTL is hosted in the cloud and is accessible from the Internet.

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

Yes, all NRC contractors supporting HCMTL have been through the NRC badging process.

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

HCMTL has been configured to log user access activities and updates to system records.

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**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.**

HCMTL is included as a subsystem of the Financial Management Systems (FMS) FISMA boundary.

**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.**

EA Number: 20210005.

## 5 Privacy Act Determination

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

Mark the appropriate response.

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

**5.2 For all collections where the information is retrieved by a personal identifier, the**

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

Mark the appropriate response in the table below.

Response	
<input checked="" type="checkbox"/>	<p><b>Yes, this system is covered by an existing SORN. (See existing SORNs: <a href="https://www.nrc.gov/reading-rm/foia/privacy-systems.html">https://www.nrc.gov/reading-rm/foia/privacy-systems.html</a>)</b></p> <p><b>Provide the SORN name, number, (List all SORNs that apply):</b></p> <p>US Federal Government-wide SORN OPM/GOVT-1 – “General Personnel Records”; NRC-19 – “Official Personnel Training Records”; NRC-21 – “Payroll Accounting Records”.</p>
<input type="checkbox"/>	<b>SORN is in progress</b>
<input type="checkbox"/>	<b>SORN needs to be created</b>
<input type="checkbox"/>	<b>Unaware of an existing SORN</b>
<input type="checkbox"/>	<b>No, this system is not a system of records and a SORN is not applicable.</b>

**5.3 When an individual is asked to provide personal data (i.e., form, webpage, survey), is a Privacy Act Statement (PAS) provided?** *A Privacy Act Statement is a disclosure statement required to appear on documents used by agencies when an individual is asked to provide personal data. It is required for any forms, surveys, or other documents, including electronic forms, used to solicit personal information from individuals that will be maintained in a system of records.*

Mark the appropriate response.

Options	
<input type="checkbox"/>	<b>Privacy Act Statement</b>
<input checked="" type="checkbox"/>	<b>Not Applicable</b>
<input type="checkbox"/>	<b>Unknown</b>

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

NRC personnel are required to provide PII (name, address, SSN, banking information, etc.) to DOI FPPS for employee hours reporting, payroll, and benefits.

## 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

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destruction/deletion because they no longer have business value) or **Permanent** (eligible at some point to be transferred to the National Archives because of historical or evidential significance). Records/data and information with historical value, identified as having a “permanent” disposition, are transferred to the National Archives of the United States at the end of their retention period. All other records identified as having a “temporary” disposition are destroyed at the end of their retention period in accordance with the NARA Records Schedule or the General Records Schedule.

These determinations are made through records retention schedules and NARA statutes (44 United States Code (U.S.C.), 36 Code of Federation Regulations (CFR)). Under 36 CFR, agencies are required to establish procedures for addressing Records and Information Management (RIM) requirements. This includes strategies for establishing and managing recordkeeping requirements and disposition instructions before approving new electronic information systems or enhancements to existing systems.

The following questions are intended to determine whether the records/data and information in the system have approved records retention schedules and disposition instructions, whether the system incorporates RIM strategies including support for [NARA’s Universal Electronic Records Management \(ERM\) requirements](#), and if a mitigation strategy is needed to ensure compliance.

**If the project/system:**

- Does not have an approved records retention schedule and/or
- Does not have an *automated* RIM functionality,
- Involves a cloud solution,
- And/or if there are additional questions regarding Records and Information Management - Retention and Disposal, please contact the NRC Records staff at [ITIMPolicy.Resource@nrc.gov](mailto:ITIMPolicy.Resource@nrc.gov) for further guidance.

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

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

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

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

<b>System Name (include sub-systems, platforms, or other locations where the same data resides)</b>	HCMTL
<b>Records Retention Schedule Number(s)</b>	<p><a href="#">GRS 2.4 Item 010</a> – “Records used to calculate payroll, arrange paycheck deposit, and change previously issued paychecks.”</p> <p><a href="#">GRS 2.4 Item 030</a> – “Time and attendance records.”</p> <p><a href="#">GRS 2.4 Item 040</a> – “Agency payroll record for each pay period.”</p> <p><a href="#">GRS 2.4 Item 050</a> – “Wage and tax statements.”</p> <p><a href="#">GRS 2.4 Item 060</a> – “Payroll program administrative records. – Administrative correspondence between agency and payroll processor, and system reports used for agency workload and/or personnel management purposes.”</p> <p><a href="#">GRS 2.4 Item 061</a> – “Payroll program administrative records. – Payroll system reports providing fiscal information on agency payroll.”</p>
<b>Approved Disposition Instructions</b>	<p><a href="#">GRS 2.4 Item 010:</a> Temporary. Destroy 3 years after paying agency or payroll processor validates data, but longer retention is authorized if required for business use.</p> <p><a href="#">GRS 2.4 Item 030:</a> Temporary. Destroy when 3 years old, whichever is sooner, but longer retention is authorized if required for business use.</p> <p><a href="#">GRS 2.4 Item 040:</a> Temporary. Destroy when 56 years old.</p> <p><a href="#">GRS 2.4 Item 050:</a> Temporary. Destroy when 4 years old, but longer retention is authorized if required for business use.</p> <p><a href="#">GRS 2.4 Item 060:</a> Temporary. Destroy when 2 years old, but longer retention is authorized if required for business use.</p> <p><a href="#">GRS 2.4 Item 061:</a> Temporary. Destroy when 3 years old or after Government Accountability Office (GAO) audit, whichever comes sooner, 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	Although HCMTL records map to the above mentioned records retention schedules, data in HCMTL is not deleted/destroyed. All records have

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includes the ability to apply records retention and disposition policies in the system(s) to support records accessibility, reliability, integrity, and disposition.	been retained to support inquiries from the Office of General Counsel (OGC) regarding open investigations.
<b>Disposition of Temporary Records</b> Will the records/data or a composite be automatically or manually deleted once they reach their approved retention?	Records/data are not deleted from the system once they reach their approved retention. There are no plans to implement automated records retention functionality.
<b>Disposition of Permanent Records</b> Will the records be exported to an approved format and transferred to the National Archives based on approved retention and disposition instructions? If so, what formats will be used? <a href="#">NRC Transfer Guidance (Information and Records Management Guideline - IRMG)</a>	No.

## 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>.*

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## 8 Privacy Act Determination

**Project/System Name:** HCM Cloud for Time and Labor System (HCMTL).

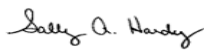
**Submitting Office:** Office of the Chief Financial Officer.

### Privacy Officer Review

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

**Comments:**

Covered by Government-wide SORN OPM/GOVT-1 – “General Personnel Records”; NRC-19 – “Official Personnel Training Records”; NRC-21 – “Payroll Accounting Records”.

Reviewer’s Name	Title
 Signed by Hardy, Sally on 09/20/23	Privacy Officer


## 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:**

Information is only collected from Federal employees within the scope of their employment.

Reviewer's Name	Title
 Signed by Cullison, David on 09/11/23	Agency Clearance Officer




## 10 Records Retention and Disposal Schedule Determination

### Records Information Management Review

Review Results	
<input type="checkbox"/>	No record schedule required.
<input type="checkbox"/>	Additional information is needed to complete assessment.
<input type="checkbox"/>	Needs to be scheduled.
<input checked="" type="checkbox"/>	Existing records retention and disposition schedule covers the system - no modifications needed.

**Comments:**

Reviewer's Name	Title
 Signed by Dove, Marna on 09/15/23	Sr. Program Analyst, Electronic Records Manager

## 11 Branch Chief Review and Concurrence

Review Results	
<input type="checkbox"/>	This project/system <b>does not</b> collect, maintain, or disseminate information in identifiable form.
<input checked="" type="checkbox"/>	This project/system <b>does</b> collect, maintain, or disseminate information in identifiable form.
<input checked="" type="checkbox"/>	I concur with the Privacy Act, Information Collections, and Records Management reviews.



Signed by Harris, Kathryn  
on 09/28/23

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Chief  
Cybersecurity Branch  
Governance and Enterprise Management  
Services Division  
Office of the Chief Information Officer

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## ADDITIONAL ACTION ITEMS/CONCERNS

<b>Name of Project/System:</b>	
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<b>Date CSB received PIA for review:</b>	<b>Date CSB completed PIA review:</b>
August 23, 2023	September 19, 2023
<b>Action Items/Concerns:</b>	
<p><i>Copies of this PIA will be provided to:</i></p> <p><i>Ledetria</i>  <i>Director (Acting)</i>  <i>IT Services Development and Operations Division</i>  <i>Office of the Chief Information Officer</i></p> <p><i>Garo Nalabandian</i>  <i>Chief Information Security Officer (CISO)</i>  <i>Office of the Chief Information Officer</i></p>	