
U.S. Nuclear Regulatory Commission



Privacy Impact Assessment Talent Management System (TMS)

**Office of the Chief Information Officer (OCIO) /
Office of the Chief Human Capital Officer (OCHCO)**

**Version 1.0
09/15/2023**

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 2.0 (03/2023)

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Privacy Impact Assessment	09/15/2023

Document Revision History

Date	Version	PIA Name/Description	Author
09/15/2023	1.0	TMS PIA – Initial Release	OCIO/OCHCO Oasis Systems, LLC
08/25/2023	DRAFT	TMS PIA - DRAFT Release	OCIO/OCHCO 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: Talent Management System (TMS).

Data Storage Location (i.e., Database Server, SharePoint, Cloud, Other Government Agency, Power Platform) Data resides within Cornerstone OnDemand, the cloud service provider.

Date Submitted for review/approval: September 27, 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.

The Talent Management System (TMS) is a Software-as-a-Service (SaaS) cloud solution that provides the U.S. Nuclear Regulatory Commission (NRC) with an online learning platform and tools for the automation of performance management tasks and strategic workforce planning. TMS is operated by Cornerstone OnDemand, Inc. (CSOD) on their cloud platform, the Cornerstone OnDemand – Unified Talent Management Suite (CUTMS).

TMS utilizes the CUTMS Learning Management and Performance Management modules to deliver web-based, instructor-led training and automation of performance management tasks. The CUTMS Learning Management System assists the NRC in complying with e-Learning standards and provides a broad range of capabilities to enable program management and tracking relevant to training efforts, curriculum development, and delivery of a variety of training courses. The CUTMS Performance Management module assists the NRC in the development of employee performance appraisals and allows the use of competency models for skill management and strategic workforce planning.

TMS supports the following agency functions:

- Storage of training records, course catalog, learning content management, course scheduling, and online course registration,
- Management and use of competency models to support the individual development plans and close skill gaps,
- Automation of performance management tasks, including development of employee performance appraisals and skill management.

TMS is comprised of the following modules:

- Learning Management module to manage the development, delivery, and tracking of training completion,
- Performance Management module to automate performance, skill, and competency management tasks.

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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 type="checkbox"/> Internal Website
<input type="checkbox"/> SharePoint	<input type="checkbox"/> None
<input checked="" type="checkbox"/> Other: Cloud-based system - Nuclear Regulatory Commission (NRC) federal employees and contractors can access the TMS application via the NRC intranet or a Web browser.	

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> The PIA has been transferred into the latest template
<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
Name	Andrey Korsak	Mary Lamary	Natalya Bobryakova	Andrey Korsak	Andrey Korsak	Mary Lamary
Office /Division /Branch	Office of the Chief Human Capital Officer (OCHCO) / Human Capital Analysis Branch (HCAB)	Office of the Chief Human Capital Officer (OCHCO)	Office of the Chief Information Officer (OCIO) / Governance and Enterprise Management Services Division (GEMSD) / Cybersecurity Branch (CSB) / Information Assurance Team (IAT)	Office of the Chief Human Capital Officer (OCHCO) / Human Capital Analysis Branch (HCAB)	Office of the Chief Human Capital Officer (OCHCO) / Human Capital Analysis Branch (HCAB)	Office of the Chief Human Capital Officer (OCHCO)
Telephone	301-287-0574	301-415-3300	301-287-0671	301-287-0574	301-287-0574	301-415-3300

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 type="checkbox"/>	Statute	
<input type="checkbox"/>	Executive Order	
<input checked="" type="checkbox"/>	Federal Regulation	Federal agencies are required to collect detailed information on training programs and needs, and to electronically report the data to the Office of Personnel Management (OPM) per 5 Code of Federation Regulations (CFR) 410 per; Regulation Identification Number (RIN) 3206-AK46; 71 Fed. Reg. 28,545.
<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 Office of the Chief Human Capital Officer (OCHCO) and NRC staff use the data collected by the system to:

- Manage and track training efforts, including training and curriculum development, training delivery, administration, monitoring functions, and reporting requirements,
- Review the status of open and completed training,
- Analyze trends based on training activity,
- Prepare and submit standard reports, NRC-developed reports, ad-hoc query results as needed,
- Performance reviews and appraisals,
- Competency and skills management.

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

Social Security numbers are not collected or stored in the TMS.

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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 type="checkbox"/>	Members of the Public (any individual other than a federal employee, consultant, or contractor)
<input type="checkbox"/>	Licensees
<input checked="" type="checkbox"/>	Other: Agreement State employees

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 type="checkbox"/>	Resume or curriculum vitae
<input 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 type="checkbox"/>	Home Address	<input type="checkbox"/>	Credit/Debit Card Number
<input 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 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 checked="" type="checkbox"/>	Other: office/organization, training related data, education history, Work/personal email addresses, Course history, performance reviews, position, grade, training dates, course and session info, cost, approvals, and training facility, affiliation, work phone number, and course/session information.
<input type="checkbox"/>	Children Information		
<input type="checkbox"/>	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).

Information from NRC employees and contractors: TMS collects information about individuals from Federal Personnel Payroll System (FPPS), and Enterprise Identity Hub (EIH).

Information from Agreement State Employees and External Users (i.e., other Federal, international, Master Materials Licensee (MML) personnel): Name, affiliation, email address, work phone number, and course/session information.

Around October 1st each year, the Office of Nuclear Material Safety and Safeguards (NMSS) sends a memo to all Agreement States to notify them of upcoming NRC training courses. Agreement States that wish to participate in these courses must fill out a training application and submit the application to NMSS.

NMSS gathers information regarding course participants and enters the information into TMS. Agreement State information consists of student name and Agreement State abbreviation.

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

- Application for NRC-Sponsored Training for Agreement State Staff, ML23116A099
- Application for NRC-Sponsored Training for MML Personnel, ML23116A103

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

Information is provided directly from the individual.

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

Information collected from Federal Personnel Payroll System (FPPS), and Enterprise Identity Hub (EIH) will be verified by the employee and an approving official.

In addition, EIH data has been verified by the Identity, Credential, and Access Management System.

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

No.

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

Information collected from Federal Personnel Payroll System (FPPS), and Enterprise Identity Hub (EIH) will be verified by the employee and an approving official.

In addition, EIH data has been verified by the Identity, Credential, and Access Management System.

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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).

Employees, contractors, and supervisors across all NRC offices have access to information that pertains to them individually. Different roles exist within the system for various levels of privileged access.

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.

TMS shares information with EIH. A scheduled report of security awareness training compliance is run daily and sent via email to the ICAMSupport.Resource@nrc.gov resource mailbox.

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

Yes, training completion data is transmitted to OPM's Enterprise Human Resources Integration Data Warehouse (EHRIDW). No external agencies/organizations/public have direct access to the data in the system.

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: OCHCO is working with OPM to establish MOU/ISA for transmitting the training completion data from TMS to OPM's EHRIDW.
<input type="checkbox"/>	None

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

TMS authentication is managed by ITI's Windows Active Directory (AD) through Single-Sign-On (SSO) to support multifactor authentication for users. Users are uniquely identified and authenticated through the Active Directory component of ITI.

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 CSP transmits the data via secure, encrypted connections as specified by OCHCO on behalf of OPM.

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

Data resides within Cornerstone OnDemand, the cloud service provider.

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

No.

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

Yes, NRC badged contractors have access to information that pertains to them individually. Different roles exist within the system for various levels of privileged access.

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

NRC relies on the CSP to secure all data in accordance with agencywide mandates and ensure that only authorized users can access the system. The CSP implements functional requirements into the technical design and implementation of the system and undergoes annual assessments to test the current safeguards.

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

No.

4.11 Define which FISMA boundary this project is part of.

TMS is a component of the NRC's Third-Party System – Talent Management (TPS-TM) subsystem. The TPS EA number is 20180002.

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 Authority To Operate (ATO) for Talent Management (TM) (ML19233A311) 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 TPS EA number is 20180002.

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5 Privacy Act Determination

5.1 Is the data collected retrieved by a personal identifier?

Mark the appropriate response.

Response	
<input type="checkbox"/>	Yes, the PII is retrieved by a personal identifier (i.e., individual's name, address, SSN, etc.)
<input checked="" type="checkbox"/>	List the identifiers that will be used to retrieve the information on the individual. Employee ID, LAN ID, Individual's name
<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): Official Personnel Training Records – NRC 19
<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

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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?

N/A.

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 checked="" type="checkbox"/>	Unscheduled

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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)	Talent Management System (TMS)
Records Retention Schedule Number(s)	<p>Unscheduled – Records for Mission-related training which is included in TMS. See Note below in Disposition Instructions regarding requirements for unscheduled records.</p> <p>GRS 2.6 item 010 - Non-mission employee training program records</p> <p>GRS 2.6 item 020 - Ethics training records</p> <p>GRS 2.6 item 030 - Individual training records</p> <p>GRS 2.2 item 070 - Employee performance file system records. Acceptable performance appraisals of non-senior executive service employees.</p> <p>GRS 2.2 item 071- Employee performance file system records. Unacceptable performance appraisals of non-senior executive service employees.</p> <p>GRS 2.2 item 072 - Employee performance file system records. Records of senior executive service employees.</p> <p>GRS 2.2 item 073 - Employee performance file system records. Performance records superseded through an administrative, judicial, or quasi-judicial procedure.</p> <p>GRS 3.1 item 020 - Information technology operations and maintenance records.</p>
Approved Disposition Instructions	<p>Unscheduled: Records for Mission-related training which is included in TMS: Additional information/data/records kept in this system may need to be</p>

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	<p>scheduled; therefore, NRC records personnel will need to work with staff to develop a records retention and disposition schedule for records created or maintained. Until the approval of such schedule, these records and information are Permanent. Their willful disposal or concealment (and related offenses) is punishable by fine or imprisonment, according to 18 U.S.C., Chapter 101, and Section 2071. Implementation of retention schedules is mandatory under 44 U.S. 3303a (d), and although this does not prevent further development of the project, retention functionality or a manual process must be incorporated to meet this requirement.</p> <p>GRS 2.6 item 010; GRS 2.6 item 020: Temporary. Destroy when 3 years old, or 3 years after superseded or obsolete, whichever is appropriate, but longer retention is authorized if required for business use.</p> <p>GRS 2.6 item 030: Temporary. Destroy when 6 years old or when superseded, whichever is later, but longer retention is authorized if required for business use.</p> <p>GRS 2.2 item 070: Temporary. Destroy no sooner than 4 years after date of appraisal, but longer retention is authorized if required for business use.</p> <p>GRS 2.2 item 071: Temporary. Destroy after employee completes 1 year of acceptable performance from the date of written advance notice of proposed removal or reduction-in-grade notice. This disposition instruction is mandatory; deviations are not allowed.</p> <p>GRS 2.2 item 072: Temporary. Destroy no sooner than 5 years after date of appraisal, but longer retention is authorized if required for business use.</p> <p>GRS 2.2 item 073: Temporary. Destroy when superseded. This</p>
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	<p>disposition instruction is mandatory; deviations are not allowed.</p> <p>GRS 3.1 item 020: Temporary. Destroy 3 years after agreement, control measures, procedures, project, activity, or transaction is obsolete, completed, terminated, or superseded, but longer retention is authorized if required for business use.</p>
<p>Is there a current automated functionality or a manual process to support RIM requirements? This includes the ability to apply records retention and disposition policies in the system(s) to support records accessibility, reliability, integrity, and disposition.</p>	<p>CSOD owns the TMS system and is responsible for the retention of its data.</p>
<p>Disposition of Temporary Records</p> <p>Will the records/data or a composite be automatically or manually deleted once they reach their approved retention?</p>	<p>CSOD owns the TMS system and is responsible for the retention of its data.</p>
<p>Disposition of Permanent Records</p> <p>Will the records be exported to an approved format and transferred to the National Archives based on approved retention and disposition instructions?</p> <p>If so, what formats will be used?</p> <p>NRC Transfer Guidance (Information and Records Management Guideline - IRMG)</p>	<p>N/A</p>

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.

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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)?

N/A.

7.3 Is the collection of information required by a rule of general applicability?

N/A.

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: Talent Management System (TMS).

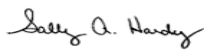
Submitting Office: Office of the Chief Human Capital Officer (OCHCO).

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:

This information is covered under System of Records, NRC 19, Official Personnel Training Records.

Reviewer's Name	Title
 Signed by Hardy, Sally on 10/13/23	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:

Currently the TMS does not need an OMB Clearance since it does not collect information directly but uses information on non-Federal employees provided by other sources. If changes are made to the system to directly collect information from non-Federal employees, the need for an OMB clearance will need to be revisited.

Reviewer's Name	Title
 Signed by Cullison, David on 10/13/23	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 checked="" type="checkbox"/>	Needs to be scheduled.
<input checked="" type="checkbox"/>	Existing records retention and disposition schedule covers the system - no modifications needed.

Comments:

Additional information/data/records kept in this system may need to be scheduled; therefore, NRC records personnel will need to work with staff to develop a records retention and disposition schedule for records created or maintained. Until the approval of such schedule, these records and information are Permanent. Their willful disposal or concealment (and related offenses) is punishable by fine or imprisonment, according to 18 U.S.C., Chapter 101, and Section 2071. Implementation of retention schedules is mandatory under 44 U.S. 3303a (d), and although this does not prevent further development of the project, retention functionality or a manual process must be incorporated to meet this requirement.

Reviewer's Name	Title
 Signed by Dove, Marna on 10/12/23	Sr. Program Analyst, Electronic Records Manager

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11 Branch Chief 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.
<input checked="" type="checkbox"/>	I concur with the Privacy Act, Information Collections, and Records Management reviews.



Signed by Harris, Kathryn
on 10/20/23

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

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ADDITIONAL ACTION ITEMS/CONCERNS

Name of Project/System: Talent Management System (TMS).

Date CSB received PIA for review:

September 28, 2023

Date CSB completed PIA review:

October 20, 2023

Action Items/Concerns:

Copies of this PIA will be provided to:

*Gwendolyn Hayden
Director (Acting)
IT Services Development and Operations Division
Office of the Chief Information Officer*

*Jonathan Feibus
Chief Information Security Officer (CISO)
Office of the Chief Information Officer*