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U.S. Nuclear Regulatory Commission

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**Privacy Impact Assessment  
Mass Notification System (MNS)  
Office of the Chief Information Officer (OCIO)**

**Version 1.0  
11/07/2023**

Mass Notification System (MNS)	Version 1.0
Privacy Impact Assessment	11/07/2023

## Document Revision History

Date	Version	PIA Name/Description	Author
11/07/2023	1.0	MNS - FINAL Release	OCIO / RES Oasis Systems, LLC
10/18/2023	DRAFT	MNS - DRAFT Release	OCIO / RES 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:** Mass Notification System (MNS).

**Data Storage Location (i.e., Database Server, SharePoint, Cloud, Other Government Agency, Power Platform)** MNS is hosted by Everbridge, Inc., in the Amazon Web Services (AWS) US East/West cloud environment.

**Date Submitted for review/approval:** November 8, 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 Mass Notification System (MNS) is a Critical Event Management Software-as-a-Service cloud solution provided by Everbridge, Inc. MNS is used by the U.S. Nuclear Regulatory Commission (NRC) to notify employees and contractors of important events such as office or building closures, weather-related event information, or any other emergency event that necessitates an emergency notification. In addition to the notification features, the system is also used to monitor personnel accountability during critical events and emergencies. MNS allows individuals to report their accountability status during emergency situations by replying to the system notifications.

Registration in the notification system is mandatory for NRC employees, whereas contractor participation is voluntary but highly encouraged. Employees and contractors register by entering their personal contact information into the NRC Enterprise Identity Hub (EIH) which transfers that data to MNS. Once individuals are registered as contacts, they will be able to receive short message service (SMS) text messages, emails, or voice messages from MNS. The MNS administrators can utilize various groups within the system to direct messages to appropriate contacts.

**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	

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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 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
<b>Name</b>	James Peyton	Gwen Hayden	Natalya Bobryakova	N/A	James Peyton	Gwen Hayden
<b>Office/Division /Branch</b>	Office of the Chief Information Officer (OCIO) / Cyber and Infrastructure Security Division (CISD)	Office of the Chief Information Officer (OCIO)	Office of the Chief Information Officer (OCIO) / Cyber and Infrastructure Security Division (CISD)	N/A	Office of the Chief Information Officer (OCIO) / Cyber and Infrastructure Security Division (CISD)	Office of the Chief Information Officer (OCIO)
<b>Telephone</b>	301-287-0701	301-415-0771	301-287-0671	N/A	301-287-0701	301-415-0771

## 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	Presidential Policy Directive 40 (PPD-40), National Continuity Policy, dated July 15, 2016, and U.S. Department of Homeland Security Federal Emergency Management Agency Federal Continuity Directive 1 (FCD-1) issued on January 17, 2017, require federal agencies to maintain a comprehensive and effective continuity capability including continuity communications.
<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).

MNS allows NRC to communicate with employees and contractors during emergencies, abnormal situations, weather conditions, and/or dangerous events occurring at an NRC facility. The data to be collected from the employees and contractors will be personal identity information including name, home phone number, personal phone number, personal e-mail address, and personal SMS / text messaging service number.

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

N/A.

### 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 type="checkbox"/>	<b>Other</b>

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 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 contact in case of an emergency
<input checked="" type="checkbox"/>	Personal Mobile Number	<input type="checkbox"/>	Accommodation/disabilities information
<input type="checkbox"/>	Marital Status	<input checked="" type="checkbox"/>	<b>Other:</b> Personal Home Phone Number
<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).**

The system collects personal contact information from the EIH portal, where individuals can modify and update their personal information.

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

Personal contact information is collected by using the EIH data forms which can be accessed through the NRC Service Catalog. The information is uploaded to MNS via a secure file transfer. Uploads occur daily to ensure the latest information is made available in MNS.

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

The individual provides the information.

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

Individuals are expected to provide accurate contact information to be notified of critical events.

**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?**

NRC staff and contractors can modify and update any inaccurate data in the EIH portal.

## **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).**

A limited number of users within the Office of the Chief Information Officer (OCIO), the Office of Administration (ADM), the Office of the Chief Human Capital Officer (OCHCO), the Office of Nuclear Security and Incident Response, and the regional offices have access to MNS. Data from MNS may be shared with other offices, as necessary, to facilitate responses to emergency situations.

**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.**

MNS receives contact information from EIH, which is a service under the NRC Identity Credential and Access Management (ICAM) System.



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

**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 type="checkbox"/>	Other
<input type="checkbox"/>	None

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

NRC personnel utilize an HTTPS connection to access MNS and authenticate using Single-Sign-On (SSO) provided by the Identity Credential and Management (ICAM) Authentication Gateway.

**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).**

Data is transmitted through a Secure File Transfer Protocol connection which encrypts data during transmission.

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

The data is stored in an AWS environment hosted by Everbridge.

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

No. The system is hosted and operated remotely by the CSP at one location.

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

MNS is a cloud service developed and operated by a FedRAMP authorized cloud service provider. Contractors are involved in the design and development of the system. The Everbridge contractor support does not possess an NRC badge.

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

A limited number of the administrators within OCIO have access to all data and the management of agency-level privileges in MNS. MNS uniquely identifies and authenticates users with the access to the system. The CSP, Everbridge, identifies logs relevant to user actions with the NRC instance. That information can be made available to agency administrators as needed.

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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.**

MNS is a subsystem of Third-Party System (TPS).

**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 An Authority to Operate (ATO) for Mass Notification System (MNS) was issued on December 30, 2021 (ML21364A164). 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.**

MNS is a subsystem of TPS; TPS EA number is 20180002.

## 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>  Individual names, geographical locations, offices, divisions, or branches will be used to retrieve information.

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<input type="checkbox"/>	<p><b>No, the PII is not retrieved by a personal identifier.</b></p> <p><b>If no, explain how the data is retrieved from the project.</b></p>
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**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><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>  <b>Provide the SORN name, number, (List all SORNs that apply):</b>            NRC 36 - Employee Locator 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 checked="" type="checkbox"/>	<b>Privacy Act Statement</b>
<input 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?**

Registration in the notification system is mandatory for NRC employees, whereas contractor participation is voluntary but highly encouraged. Employees and contractors register by entering their personal contact information into the NRC Enterprise Identity Hub (EIH) which transfers that data to MNS. Once individuals are registered as contacts, they will be able to receive short message service (SMS) text messages, emails, or voice messages from MNS. The MNS administrators can utilize various groups within the system to direct messages to appropriate contacts.

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## 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](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>	MNS
<b>Records Retention Schedule Number(s)</b>	<a href="#">GRS 5.3 – item 020</a> : Continuity and Emergency Planning Records. Employee Emergency Contact Information
<b>Approved Disposition Instructions</b>	<b>Temporary.</b> Destroy when superseded or obsolete, or upon separation or transfer of employee.
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.	N/A
<b>Disposition of Temporary Records</b>  Will the records/data or a composite be automatically or manually deleted once they reach their approved retention?	Yes
<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>	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, the project will be collecting any information from 10 or more persons who are not Federal employees.

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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)?**

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:** Mass Notification System (MNS).

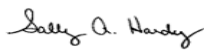
**Submitting Office:** Office of the Chief Information Officer (OCIO)

### 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 <b>retrieved</b> by a personal identifier.

**Comments:**

This information is covered by NRC System of Records Notice, NRC 36 - Employee Locator Records.

Reviewer's Name	Title
 Signed by Hardy, Sally on 11/28/23	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:**

An OMB clearance is not needed as long as the information collected from contractors is limited to Name, Address, Phone Number, and email address.

Reviewer's Name	Title
 Signed by Cullison, David on 11/24/23	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 checked="" 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 11/21/23	Sr. Program Analyst, Electronic Records Manager

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## 11 Branch Chief Review and Concurrence

Review Results	
<input type="checkbox"/>	This project/system <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.

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



Signed by Feibus, Jonathan  
on 11/28/23

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

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## ADDITIONAL ACTION ITEMS/CONCERNS

<b>Name of Project/System:</b> Mass Notification System (MNS).	
<b>Date CISD received PIA for review:</b> November 20, 2023	<b>Date CISD completed PIA review:</b> November 28, 2023
<b>Action Items/Concerns:</b>          	
<p><i>Copies of this PIA will be provided to:</i></p> <p><i>Caroline Carusone</i> <i>Director</i> <i>IT Services Development and Operations Division</i> <i>Office of the Chief Information Officer</i></p> <p><i>Garó Nalabandian</i> <i>Deputy Chief Information Security Officer (CISO)</i> <i>Office of the Chief Information Officer</i></p>	