U.S. NUCLEAR REGULATORY COMMISSION
PLAN TO ELIMINATE THE UNNECESSARY COLLECTION AND
USE OF SOCIAL SECURITY NUMBERS

INTRODUCTION

In response to the Office of Management and Budget (OMB) May 22, 2007, memorandum (M-07-16), "Safeguarding Against and Responding to the Breach of Personally Identifiable Information," the U.S. Nuclear Regulatory Commission (NRC) has established a plan in which the agency will eliminate the unnecessary collection and use of the Social Security number (SSN) by November 22, 2008, in compliance with OMB's eighteen month time frame.

The NRC's mission is to license and regulate the Nation's civilian use of byproduct, source, and special nuclear materials to ensure adequate protection of public health and safety, promote the common defense and security, and protect the environment. The NRC is not an agency whose primary purpose is to collect and maintain information about individuals. Of the personally identifiable information (PII) that NRC does collect and use, a significant majority relates to its personnel (employees and contractors).

The NRC has initiated improvements related to the protection of PII. These improvements are based on the NRC's Office of the Inspector General (OIG) June 30, 2006, Audit (OIG-06-A-14), "Evaluation of Personal Privacy Information Found on NRC Network Drives", OMB's June 23, 2006, memorandum (M-06-16), "Protection of Sensitive Agency Information," and NRC Chairman Dale E. Klein's July 26, 2006, memorandum, "Protection of Personal Privacy Information." The increase in recent reporting of stolen/missing laptop computers containing PII at various Government agencies was an additional incentive for improving the NRC's protection of PII.

In response to the OIG audit, which found PII on agency-shared network drives, the NRC's Office of the Executive Director for Operations directed agency staff to review data generated or stored on the shared network drives for PII. As of April 18, 2007, the searches of the shared network drives were completed and all PII that was identified was either removed from the shared drives or access to the PII was restricted to individuals with a need-to-know. Agency staff have been instructed not to place PII on shared network drives unless access to this information is restricted to individuals with a need-to-know. NRC has also developed policies and procedures that include periodic (annual) reviews of agency network drives for the presence of PII.

In an effort to identify how PII is used in the NRC and to develop policies and procedures to protect PII, the NRC's Senior Agency Official for Privacy established a task force on September 29, 2006. The objectives of the task force, which consists of representatives from each of the NRC program and support offices at its Headquarters and Regional locations, are to identify current data sources containing PII, review the use of the SSN and other PII to reduce its collection and storage, recommend modifications to business processes and operations to protect PII, and increase staff awareness of PII issues, policies, and procedures.

IDENTIFYING THE COLLECTION AND USE OF THE SSN

The NRC has identified the collections and uses of the SSN through multiple actions. The PII task force began its efforts in October 2006, coordinating with each of the agency's program and support offices, compiling details of the types of PII used throughout the agency, the data sources that contain PII, the forms the agency uses that collect PII, the uses and dissemination of PII, and the methods used to store and safeguard PII. In January 2007, the NRC prepared its response to OMB's December 5, 2006, request for Federal agencies to complete a matrix identifying their processes where the SSN is used and collected. In May 2007, to assist in developing the agency plan to eliminate the unnecessary uses and collection of the SSN, the PII task force began analyzing the information compiled on the agency's PII use and collection to determine how and where specific uses and collections of the SSN could be reduced or eliminated.

ELIMINATING THE UNNECESSARY COLLECTION OF THE SSN

The NRC is in the process of reviewing all agency forms in an effort to reduce or eliminate where possible the unnecessary collection of PII. Currently, the NRC maintains 425 forms in its inventory. As of August 3, 2007, the NRC determined that 68 of the 425 forms collect PII. Of the 68 forms that collect PII, 42 have been identified as collecting the SSN.

To address the unnecessary collection of the SSN as required in OMB M-07-16, the NRC began its review of all agency forms by first focusing on the 42 forms that collect the SSN. Each form is being reviewed in coordination with the owner of the form (sponsoring office) to determine if the collection of PII, including the SSN, is necessary. If the collection of all or part of the PII is determined to be necessary, the requirement to collect the PII, especially the SSN, will be identified along with any process that will be modified to either reduce or visually mask access. Although the collection of the SSN may be considered a required collection, the SSN will be replaced when agencies are instructed to do so, with the Office of Personnel Management (OPM) proposed unique employee identification number (UEID). If the NRC determines that the collection of part or all of the PII is unnecessary, a decision will be made to discontinue the collection or, in the case of the SSN, replace it with another unique identifier. The NRC plans has completed the review of the 42 forms that collect the SSN, including incorporating all identified revisions, as of November 30, 2007. The NRC completed the review of the remaining 26 forms identified as collecting PII, but did not collect the SSN, as of January 31, 2008. The NRC's forms review process will be an ongoing effort to ensure that all agency forms, current or proposed, that collect not only the SSN, but any PII, are reviewed to prevent, reduce, or eliminate any unnecessary collections.

The majority of NRC forms that collect the SSN are owned by the NRC's Office of Human Resources, Office of the Chief Financial Officer (OCFO), and Office of Administration (ADM) and are used for personnel, payroll/accounting, and security purposes. The NRC's elimination of the SSN or replacement of the SSN on these forms with the proposed OPM UEID or other acceptable unique identifier can only be implemented based on guidance received from the Federal agency requiring the collection (i.e. OPM, Internal Revenue Service (IRS), Federal Bureau of Investigation (FBI), etc). The NRC will convert from the use of the SSN to the use of the OPM UEID consistent with OPM and OMB guidance when such guidance is issued.

ELIMINATING THE UNNECESSARY USES OF THE SSN

The majority of the NRC's SSN uses are based on requirements placed upon the NRC by other Federal agencies, for example the OPM's requirement to use the SSN as a unique identifier for maintaining official federal personnel records and the IRS' requirement to use the SSN as a unique identifier for reporting payroll earnings. Any action to eliminate an externally driven required use will depend on guidance issued to NRC by that external entity. Therefore, NRC's review to eliminate unnecessary SSN uses focuses on internally driven uses.

The NRC's review has identified a use of the SSN that is considered to be unnecessary and will be eliminated. This is the use of the SSN to verify an employee's identity for tracking dosimeters used to measure exposure to radiation. The employee identification number will replace the SSN in the ADM's Dosimeter Tracking System for all existing and newly created records. Employees will show their badge to verify their identity when they pick up and return a dosimeter, but the bar code on their badge will no longer be scanned to collect the SSN. This change required a modification to the Dosimeter Tracking System which was completed by October 30, 2007.

The NRC's review has also identified uses that, although necessary, involve processes that can be modified to reduce access to the SSN. Below are the processes that have been identified where access to PII, including the SSN, is being reduced.

One area the NRC has identified where access to and use of the SSN can be reduced is within an organization's administrative office files. Each program office maintains administrative files on its employees, which include copies of travel, training, personnel, time and attendance, and payroll records for administrative purposes. The Privacy Act systems of records managers will be instructed to provide specific guidance to the custodians of these files by early January 2008, stating exactly what documents they are authorized to maintain copies of and how long the copies should be retained. The system managers will then require confirmation from the custodians by March 31, 2008, that the review of the administrative files for compliance with the recordkeeping requirements has been completed. This recordkeeping guidance will then become part of a system manager's annual reminder to custodians of Privacy Act records on the procedures, guidelines, and safeguards applicable to a system of records, and of the responsibilities involved in protecting the records from unauthorized access.

The NRC is also working on a project to identify all of its procurements for acquisition of supplies and services (contract/simplified acquisitions) that receive, process, or maintain PII. To identify these procurements, the Statement of Work for each active contract/simplified acquisition will be reviewed by the assigned project officer to determine if receiving, processing, or maintaining PII is stated under the terms of the contract/simplified acquisition. The NRC has completed these procurements identified as of November 30, 2007. Once identified, all holdings will be reviewed to determine if the PII being received, processed, or maintained is necessary, and if it is being handled in a manner to ensure security and integrity. This project was completed as of November 22, 2008.

Although still considered to be a necessary use of PII, the NRC's OCFO identified a process to reduce access to the SSN and all PII by limiting its visibility in the agency's Federal Financial System (FFS). The OCFO created, tested, and loaded a new vendor table that

masks all PII. Only system users requiring full access to PII as a requirement of their official duties will be authorized to access the unmasked vendor table or any other tables containing PII. All FFS user access profiles have been reviewed and revised as needed to ensure access to PII is limited to those with a need-to-know. This system update was completed on June 6, 2007.

After performing a review to identify instances where the SSN is used, the NRC's Region IV staff determined that the use of the SSN in the Region IV Travel database was unnecessary and could be eliminated. In order to immediately eliminate use of the SSN and at the same time to minimize changes to the database, the system was modified to record the SSN for each traveler to a common number of 000-00-0000, no longer allowing the SSN to be included in the database. This change was implemented on August 1, 2007.

COMPLETION

The elimination of the collections and uses of the SSN that the NRC has determined to be unnecessary has been completed as of November 22, 2008, as required by OMB M-07-16. Where the collection and use of the SSN is considered to be necessary based on requirements placed upon the NRC by outside sources, the completion of any further actions involving its elimination or replacement will depend on the guidance and schedules issued to all Federal agencies by those sources. No new activities or updates have occurred in FY 2017.

masks all PII. Only system users requiring full access to PII as a requirement of their official duties will be authorized to access the unmasked vendor table or any other tables containing PII. All FFS user access profiles have been reviewed and revised as needed to ensure access to PII is limited to those with a need-to-know. This system update was completed on June 6, 2007.

After performing a review to identify instances where the SSN is used, the NRC's Region IV staff determined that the use of the SSN in the Region IV Travel database was unnecessary and could be eliminated. In order to immediately eliminate use of the SSN and at the same time to minimize changes to the database, the system was modified to record the SSN for each traveler to a common number of 000-00-0000, no longer allowing the SSN to be included in the database. This change was implemented on August 1, 2007.

COMPLETION

The elimination of the collections and uses of the SSN that the NRC has determined to be unnecessary will be completed by November 22, 2008, as required by OMB M-07-16. Where the collection and use of the SSN is considered to be necessary based on requirements placed upon the NRC by outside sources, the completion of any further actions involving its elimination or replacement will depend on the guidance and schedules issued to all Federal agencies by those sources.