

## **Privacy Threshold Analysis Template**

*(To be used to determine whether a privacy impact assessment is required in accordance with the E-Government Act of 2002.)*

**Date submitted for review:** October 20, 2017

**Name of Project/System:** Collaborative Learning Environment (CLE)

**Sponsoring Office:** Office of the Chief Human Capital Officer (OCHCO)

**Project manager name and phone number:** Michael Gartman, 301-287-0716

### **1. Describe (in detail) the project/system and its purpose:**

NRC's current approach to learning and development is primarily through traditional face-to-face classroom training; however, this approach is not sustainable due to shrinking budgets for training and travel. Changing the current model to incorporate appropriate use of online learning technologies through a blended approach can:

- Increase training effectiveness
- Reduce costs
- Reduce time to qualification
- Leverage the strengths of the changing NRC workforce

Transformation of the learning includes a broadening of those traditional processes to include a more "Blended" or "Collaborative Learning" capability. "Blended/collaborative learning" is the combination of two or more educational techniques utilized to optimize knowledge transfer and delivery using both formal and informal approaches.

Listed below are features blended/collaborative learning utilizes to expand the student's experience:

- On-line, interactive virtual classrooms
- Web-based communities of learning and communities of practice
- Blogs/Forums/Discussion Boards/Wiki's
- Seminars and Webinars
- Interactive 3D Models/Activity Enhancements
- Classroom Instruction
- Simulation

### **2. What agency function does it support:**

Human Capital Strategy 5: Enhance employee learning opportunities and optimize the use of training resources from an agency wide perspective to meet the agency's current and future critical skill needs - Optimize the development and delivery of training to build needed competencies, including the identification of courses that are suitable for conversion to online or blended delivery.

**3. Status:**

New development effort.

Existing system.

- Date first developed:
- Date last updated:
  - Provide a general description of the update:

**4. Could the project/system relate in any way to individuals?**

No

Yes

- **Provide a general description of the way the project could relate to an individual.**

There are a limited number of courses available within the CLE, less than ten. Course completion and attendance are captured for each individual.

**5. Does this project collect, process, or retain information on: (Check all that apply)**

NRC employees?

Other Federal employees?

Including Agreement States. ("NRC provides assistance to States expressing interest in establishing programs to assume NRC regulatory authority under the Atomic Energy Act of 1954, as amended. Section 274 of the Act provides a statutory basis under which NRC relinquishes to the States portions of its regulatory authority to license and regulate byproduct materials (radioisotopes); source materials (uranium and thorium); and certain quantities of special nuclear materials. The mechanism for the transfer of NRC's authority to a State is an agreement signed by the Governor of the State and the Chairman of the Commission, in accordance with section 274b of the Act.")

Contractors working on behalf of NRC?

Members of the public or "other individuals"?

System does not contain any such information.

**6. Does this project use or collect Social Security Numbers (SSNs)? (This includes truncated SSNs, such as the "last four.")**

No

Yes

- **Why is the SSN collected or used? Provide the function of the SSN and the legal authority to do so.**

**7. What information about an individual could be collected, generated or retained? Provide a detailed description of the information that might be collected, generated, or retained such as names, addresses, phone numbers, etc.**

The following information is captured for an individual: last name, first name, iLearn User Id, domain, role, organization, supervisor, job location, employment type, status, and work email. None of the information captured contain privacy impact information. There are a limited number of courses available within the CLE. Course completion and attendance are captured for each individual.

**8. Does the system share personally identifiable information with any other NRC systems?**

No

Yes

- Identify the systems:

**9. Does this system relate solely to infrastructure? [For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)]?**

No

Yes

- If yes, is there a log kept of communication traffic?
- If yes, what type of data is recorded in the log? List the data elements in the log.

**10. Can the system be accessed remotely?**

No

Yes

- **If yes, how?**

The system is hosted by OPM, USALearning, a Shared Service Provider external to NRC. USALearning provides the hardware, software and maintenance services. The latest Authority to Operate (ATO) was obtained by OPM on October 22, 2013. User can access

the site via <https://nrc.usalearning.net/> through a browser. USA Learning employs a secure socket layer (SSL) 2,048-bit encryption.

**11. Is there an approved records retention schedule? (Refer to NUREG-0910, NRC Comprehensive Records Disposition Schedule.)**

Yes

- **If yes, please provide the schedule number and approved disposition:**  
GRS 1-29 and GRS 20-3  
iLearn will continue to remain as the system of record for training. CLE will only be the pilot for distance learning with the option for blended learning.

No

- If no, contact the Records and Archives Services Section for further guidance.

**12. Is there a Certification & Accreditation record?**

Unknown

No

Yes: Indicate the determinations for each of the following:

Confidentiality:	<input checked="" type="checkbox"/> <b>Low</b>	<input type="checkbox"/> Moderate	<input type="checkbox"/> High	<input type="checkbox"/> Undefined
Integrity:	<input type="checkbox"/> Low	<input checked="" type="checkbox"/> <b>Moderate</b>	<input type="checkbox"/> High	<input type="checkbox"/> Undefined
Availability:	<input checked="" type="checkbox"/> <b>Low</b>	<input type="checkbox"/> Moderate	<input type="checkbox"/> High	<input type="checkbox"/> Undefined

**PRIVACY THRESHOLD ANALYSIS REVIEW**

(To be completed by: Information Services Branch, Governance & Enterprise Management Services Division, Office of the Chief Information Officer)

**Date reviewed:** December 22, 2017

**Name of the reviewer:** Sally A. Hardy, Acting Privacy Officer

No, this is NOT a privacy sensitive system – the system contains no personally identifiable information.

Yes, this IS a privacy sensitive system. A privacy impact assessment is required.

COMMENTS:

The information collected is business related information. Information is not retrieved by a personal identifier. Even though the system has the ability to retrieve information by an individual's name, the purpose of the system is for tracking course completion and attendance information. ILearn will continue to remain as the system of record for training and CLE will only be the pilot for distance learning.

Information related to the workplace such as an employee's name, title, work telephone number, official work address/location, and work e-mail address is not treated as PII by NRC.

I concur with this analysis:

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/RA/  
Anna T. McGowan, Chief  
Information Services Branch  
Governance & Enterprise Management  
Services Division  
Office of the Chief Information Officer

Date: \_\_\_\_\_ January 9, 2018