
U.S. Nuclear Regulatory Commission



Privacy Impact Assessment Collaborative Learning Environment (CLE)

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

**Version 1.0
07/11/2025**

Collaborative Learning Environment (CLE)	Version 1.0
Privacy Impact Assessment	07/11/2025

Document Revision History

Date	Version	PIA Name/Description	Author
07/11/2025	1.0	CLE PIA – Converted CLE PTA to a PIA due to the fact that the system generates data that contains PII (e.g., users' scores and grades).	OCIO/OCHCO Oasis Systems, LLC
06/23/2025	DRAFT	CLE PIA – Converted CLE PTA to a PIA due to the fact that the system generates data that contains PII (e.g., users' scores and grades).	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: Collaborative Learning Environment (CLE).

Data Storage Location (i.e., Database Server, SharePoint, Cloud, Other Government Agency, Power Platform): Data resides within the PowerTrain Government Learning Enclave cloud environment.

Date Submitted for review/approval: July 11, 2025.

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 CLE is a Government Off-The-Shelf and Software as a Service (SaaS) cloud-based solution operated and maintained by PowerTrain, Inc. CLE resides within the PowerTrain Government Learning Enclave SaaS cloud environment. The U.S. Nuclear Regulatory Commission (NRC) uses the CLE platform to develop the training courses and provide training (instructor-led, blended learning, and online courses) to NRC staff, Agreement State personnel, other government agencies, and international partners.

The CLE provides the following features:

- Online platform for NRC instructors to develop training courses
- Virtual classrooms for online interactive learning
- Online learning communities and workshops
- Blogs/Discussion Forums/Online learning materials
- Seminars and webinars
- Interactive 3D models/activity enhancements/simulations
- Users' learning history, enrolled courses, and training certificates

CLE provides e-Learning products, information, and services to enhance employee learning opportunities and optimize the use of training resources to support the development of the agency's workforce to meet current and future critical skill needs. CLE optimizes 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.

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

☐ PowerApps	☐ Artificial Intelligence (AI)
☐ Dashboard	☐ Public Website
☐ SharePoint	☐ Internal Website
☒ Cloud Service Provider: Cloud-based system; CLE is hosted by PowerTrain in a cloud environment. NRC users can access the CLE web application via the Internet at https://nrc.usalearning.net/ .	☐ Other
☐ Server/Database Design	

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	
☐	New system/project
☐	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>
☐	Annual Review <i>If making minor edits to an existing system/project, briefly describe the changes below.</i>
☒	Other: Converted CLE PTA to a PIA due to the fact that the system generates data that contains PII (e.g., users' scores and grades).

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1.3 Points of Contact:

Role	Contact Information Name Office/Division/Branch Phone Number
Project Manager(s)	Christopher West Office of the Chief Human Capital Officer (OCHCO) / Human Resources Learning and Development (HRLD) Division / Learning Innovation and Support Branch (LISB) 423-855-6503
System Owner/Data Owner or Steward	Jeff Griffis OCHCO / HRLD Division / Learning Innovation and Support Branch (LISB) 423-855-6639
ISSM	Natalya Bobryakova Office of the Chief Information Officer (OCIO) / Cyber and Information Security Division (CISD) / Information Assurance and Oversight Branch (IAOB) 301-287-0671
Executive Sponsor	Susan Abraham OCHCO / HRLD Division 301-287-0718
Other	N/A

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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
☐	Statute	
☐	Executive Order	
☒	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.
☐	Memorandum of Understanding/Agreement	
☐	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 OCHCO and NRC staff use the data collected by the system to provide e-Learning products, information, and services to enhance employee learning and qualification opportunities and optimize the use of training resources to support the development of the agency's workforce to meet current and future critical skill needs.

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 CLE.

3 Characterization of the Information

In the table below, mark the categories of individuals for whom information is collected.

Category of individual	
☒	Federal employees
☒	Contractors
☒	Members of the Public (any individual other than a federal employee, consultant, or contractor)
☐	Licensees
☒	Other: • Members of international partner organizations • Agreement State staff. (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.)

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](#).

Categories of Information			
☒	Name	☐	Resume or curriculum vitae
☐	Date of Birth	☐	Driver's License Number
☐	Country of Birth	☐	License Plate Number
☐	Citizenship	☐	Passport number
☐	Nationality	☐	Relatives Information
☐	Race	☐	Taxpayer Identification Number
☐	Home Address	☐	Credit/Debit Card Number
☐	Social Security number (Truncated or Partial)	☐	Medical/health information
☐	Sex (Male or Female)	☐	Alien Registration Number
☐	Ethnicity	☐	Professional/personal references
☐	Spouse Information	☐	Criminal History
☐	Personal e-mail address	☐	Biometric identifiers (facial images, fingerprints, iris scans)
☐	Personal Bank Account Number	☐	Emergency contact e.g., a third party to contact in case of an emergency

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Categories of Information			
☐	Personal Mobile Number/Home Number	☐	Accommodation/disabilities information
☐	Marital Status	☒	Other: User Identification (ID) (User ID from Talent Management System (TMS)), domain, role, work email address, and users' educational data (system generated scores and grades).
☐	Children Information		
☐	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).

NRC employees/contractors' data is collected through existing NRC files/databases provided by the Enterprise Identity Hub (EIH), a secure central repository for electronic identity information.

Agreement State personnel and Master Materials Licensee (MML) personnel data is collected through approval using the Office of Nuclear Material Safety and Safeguards (NMSS) enrollment process.

NRC's International partners data is collected through the NRC's Office of International Programs (OIP) enrollment vetting process.

Students from other government agencies data is collected through the Human Resource Training & Development (HRTD) Management vetting process.

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

The training requests for the Agreement State personnel and MML personnel are collected by NMSS using the following forms:

- Application for NRC-Sponsored Training for Agreement State Staff, [ML23116A099](#).
- Application for NRC-Sponsored Training for MML Personnel, [ML23116A103](#).

NMSS deletes the obtained training requests after completing the training assignments in TMS and CLE.

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.

Data is collected from different sources, when applicable, accuracy of the data collected is validated by users, an approving official, and the NRC Identity, Credential, and Access Management System (ICAM).

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3.5 Will PII data be used in a test environment? If so, explain the rationale for this and how the PII information is protected.

No.

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

Information collected is verified by the users, an approving official and the NRC ICAM. Administrators can also correct limited inaccurate information at the source.

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.

The CLE shares information with TMS. This information consists of the user's first name, last name, email address, TMS User ID number, course grade, and course completion status. This information is shared through a system generated spreadsheet that is uploaded to TMS.

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

N/A.

If so, identify what agreements are in place with the external non-NRC partner or system in the table below.

Agreement Type	
☐	Contract Provide Contract Number:
☐	License Provide License Information:
☐	Memorandum of Understanding Provide ADAMS ML number for MOU:
☐	Other
☒	None

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

The system is hosted in the PowerTrain Government Learning Enclave SaaS cloud environment. The users access the CLE web application via the Internet at <https://nrc.usalearning.net/>. NRC users are authenticated through the NRC's ICAM Authentication Gateway, and they log in to CLE using a Single Sign-on from the NRC network. The external users are required to use a Two-Factor-Authentication method to log in to CLE (username/password and a one-time verification code that is automatically sent to the user's registered email address).

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 is transmitted via secure, encrypted connections.

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

Data resides within the PowerTrain cloud environment.

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? Have the contractors completed an IT-II investigation? Do they possess an NRC badge?

Yes, NRC vetted contractors have access to information that pertains to them individually. Different roles exist within the system for various levels of privileged access. The users who have "Instructor" or "Manager" roles can see the users' scores for specific courses.

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

NRC relies on the Cloud Service Provider (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.

CLE is a component of the NRC's Third Party System (TPS) Talent Management (TM) Subsystem.

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4.12 Is there an Authority to Operate (ATO) associated with this project/system?

Authorization Status	
☐	Unknown
☐	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>
☐	In Progress provide the estimated date to receive an ATO. Estimated date:
☒	Yes Indicate the data impact levels (Low, Moderate, High, Undefined) approved by the Chief Information Security Officer (CISO) Confidentiality-Low Integrity-Low Availability-Low

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.

5 Privacy Act Determination

5.1 Is the data collected retrieved by a personal identifier?

Mark the appropriate response.

Response	
☒	Yes, the PII is retrieved by a personal identifier (i.e., individual's name, address, SSN, or other unique number, etc.) List the identifiers that will be used to retrieve the information on the individual. The system has the ability to retrieve information by an individual's name.
☐	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.

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Mark the appropriate response in the table below.

Response	
☒	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): NRC 19 - Official Personnel Training Records, OPM GOVT-1 – General Personnel Records
☐	SORN is in progress
☐	SORN needs to be created
☐	Unaware of an existing SORN
☐	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	
☐	Privacy Act Statement
☒	Not Applicable
☐	Unknown

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

For a user to gain access to the system, they must provide their name and work email address to create their account/profile. The users' scores and grades are generated by the system.

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

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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?

☐	NUREG-0910, "NRC Comprehensive Records Disposition Schedule"
☒	NARA's General Records Schedules
☒	Unscheduled

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)	CLE
Records Retention Schedule Number(s)	Unscheduled – Mission-related Training. Disposition remains Permanent until it there's an approved records retention schedule. See note in Disposition instructions.

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	GRS 2.6 item 010 (superseded former GRS 1 item 29) Non-mission employee training records. Temporary. GRS 2.6 item 030 (superseded former GRS 1 item 29) Individual training records. Temporary.
Approved Disposition Instructions	Unscheduled – Mission-related Training. (Disposition remains Permanent until there's an approved records retention schedule.) 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. GRS 2.6 item 010 (superseded former GRS 1 item 29) 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. GRS 2.6 item 030 (superseded former GRS 1 item 29) Temporary. Destroy when superseded, 3 years old, or 1 year after separation, whichever comes first, but longer retention is authorized if required for business use.
Is there a current automated functionality or a manual process to support RIM requirements? This includes the ability to	PowerTrain owns the CLE system and is responsible for the retention of its data.

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apply records retention and disposition policies in the system(s) to support records accessibility, reliability, integrity, and disposition.	
Disposition of Temporary Records Will the records/data or a composite be automatically or manually deleted once they reach their approved retention?	PowerTrain owns the CLE system and is responsible for the retention of its data.
Disposition of Permanent Records 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? NRC Transfer Guidance (Information and Records Management Guideline - IRMG)	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.

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: Collaborative Learning Environment (CLE)

Submitting Office: OCHCO

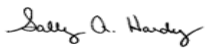
Privacy Officer Review

Review Results		Action Items
☐	This project/system does not contain PII .	No further action is necessary for Privacy.
☐	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.
☒	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 by NRC 19 - Official Personnel Training Records, OPM GOVT-1 – General Personnel Records.

CISO please see last page for additional considerations for this system.

Reviewer's Name	Title
 Signed by Hardy, Sally on 09/10/25	Privacy Officer

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9 OMB Clearance Determination

NRC Clearance Officer Review

Review Results	
☒	No OMB clearance is needed.
☐	OMB clearance is needed.
☐	Currently has OMB Clearance. Clearance No. _____

Comments:

Based on the information in the PIA, the information being collected from non-Federal employees is limited to what is needed for self-identification. No OMB clearance is needed.

Reviewer's Name	Title
 Signed by Cullison, David on 08/15/25	Agency Clearance Officer

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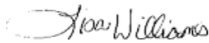
10 Records Retention and Disposal Schedule Determination

Records Information Management Review

Review Results	
☐	No record schedule required.
☐	Additional information is needed to complete assessment.
☒	Needs to be scheduled.
☒	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 08/28/25	Sr. Program Analyst, Electronic Records Manager
 Signed by Williams, Lisa on 08/28/25	Records and Information Management Specialist

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11 Review and Concurrence

Review Results	
☐	This project/system does not collect, maintain, or disseminate information in identifiable form.
☒	This project/system does collect, maintain, or disseminate information in identifiable form.

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



Signed by Nalabandian, Garo
on 09/10/25

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

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ADDITIONAL ACTION ITEMS/CONCERNS

Name of Project/System:	
Collaborative Learning Environment (CLE)	
Date CISD received PIA for review:	Date CISD completed PIA review:
July 11, 2025	September 10, 2025
Action Items/Concerns: Note for CISO: After reviewing the PIA for CLE, I have determined that it qualifies as a low-impact system. The privacy data collected and maintained within the system is minimal, consisting only of the user's name, NRC email address, and their associated scores and grades. Based on this assessment, the loss or unauthorized disclosure of this information would likely result in limited, short-term embarrassment to the affected individual, with no significant or lasting harm anticipated. Additionally, if the grades or test scores are favorable, there would be lower likelihood of adverse impact.	