

Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Make Public After President Submits Budget (For OIS Use Only)
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## U.S. Nuclear Regulatory Commission Privacy Impact Assessment

**Instructions:**      **Section A, B, C, and D must be completed for all systems. Section E must be completed if yes is the answer to Section B, questions 1 and 2.**

**Date:** 04/21/06

### A. GENERAL SYSTEM/APPLICATION INFORMATION

(See definitions at end of document)

1. Person completing this form:

Name	Title	Phone No.	Office
Margie Dimig Len Reidinger	Co-Project Manager Project Manager	301-415-5781 423-855-6523	OIS HR/HRDT

2. System owner:

Name	Title	Phone No.	Office
James F. McDermott	Director	301-415-7516	HR

3. What is the name of this system?

Learning Management System (LMS)

4. Briefly describe the purpose of this system. What agency function does it support?

The current approach of leaving training administration as the only module remaining on PeopleSoft is cost prohibitive for HR. The office cannot fund the required upgrade to PeopleSoft and the Operating and Maintenance costs associated with staying with the current approach.

Going to a learning management system provides the agency with a much more robust process for handling training administration functions. It will also provide the agency with a compliance tracking capability that did not previously exist. This is especially important for the regional offices and the new employee development programs.

One of the goals for the agency/HR is to “sustain a high-performing, diverse workforce”. Training is a vital part of ensuring that the agency staff has the knowledge skills and abilities to successfully carry out the agency’s mission. The agency advances continuous learning as a strategic business investment. A well developed Learning Management System will support and advance the President’s Management Agenda in e-Gov and e-Training arenas, and it will enhance agency human capital initiatives by supporting and/or leveraging existing training resources, and providing a focal point for their access.

5. Does this Privacy Impact Assessment support a proposed new system or a proposed modification to an existing system.

  X\*   New System                             Modify Existing System

\*Current PeopleSoft system is being replaced with this system.

## **B. PRIVACY ACT APPLICABILITY**

1. Does this system collect, maintain, or disseminate personal information in identifiable form (e.g., name, social security number, date of birth, home address, etc.) about individuals?

Yes  X                       No       

If yes, give category of individuals (e.g., Federal employees, Federal contractors, general public, etc.)

NRC employees

Agreement State employees

Other Government Agency employees (i.e., Army, Navy, Air Force, FBI)

Other nations Regulatory Agencies (IAEA member countries) employees

2. If yes, will the data be retrieved by an individual’s name or other personal identifier (e.g., social security number, badge number, etc.)?

Yes  X                       No       

**If you answer yes to questions 1 and 2, complete Section E.**

## **C. INFORMATION COLLECTION APPLICABILITY**

1. Will the personal data be collected from or maintained by persons who are not Federal employees?

Yes  X                       No

2. Will the data be collected from Federal contractors?  
Yes \_\_\_\_ No X
3. If the answer is yes to either question 1 or 2, will the data be collected from 10 or more persons during a calendar year?  
Yes X No \_\_\_\_
4. If the answer is yes to question 3, is the information to be collected covered by an existing OMB clearance number? If yes, indicate the clearance number.  
Yes, OMB Clearance Number 3150-0183.

**D. RECORDS RETENTION AND DISPOSAL SCHEDULE APPLICABILITY**

Does this system already have a NARA-approved records disposition schedule? (Reference NUREG-0910, "NRC Comprehensive Records Disposition Schedule," or contact your office Records Liaison Officer or Jeffrey Bartlett, OIS.)

Yes X No \_\_\_\_

If yes, list the records schedule number: GRS 1-29 and GRS 20-3.

<p><b><i>Complete Section E only if the answers to Section B, questions 1 and 2 are Yes.</i></b></p>
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**E. SYSTEM DATA INFORMATION**

1. *Type* of information maintained in the system
- a. Describe the information to be maintained in the system (e.g., financial, medical, training, personnel.) Give a detailed description of the data.
- Agency training records: Name, social security number, date of birth, office/organization, position, grade, office location and telephone number, e-mail address, training dates, course and session information, cost, approvals, training facility.
2. *Source* of the data in this system
- a. Are data being collected from the subject individual? If yes, what types of data are being collected?
- Yes.

From NRC employees: Name, social security number, date of birth, office/organization, position, grade, office location and telephone number, e-mail address, training dates, course and session info, cost, approvals, training facility.

From Agreement State employees, other Government Agency employees (i.e., Army, Navy, Air Force, FBI), and other nations Regulatory Agencies (IAEA member countries) employees: Name, affiliation, and course/session information.

- b. Are data on this individual being collected from other NRC files and databases for this system? If yes, identify the files and databases.

Yes. Human Resources Management System (HRMS) and DOI/Federal Payroll/Personnel System.

- c. Are data on this individual being collected from a source or sources other than the subject individual and NRC records? If yes, what is the source and what type of data is being collected?

No.

- d. How will data collected from sources other than the subject individual or NRC records be verified as current, accurate, and complete?

N/A

3. *Attributes of the data*

- a. Are the *data elements* described in detail and documented? If yes, what is the name of the document? Where is it located?

Yes. The data elements are contained in the Learning Management System, Systems Operation Manual, located at the Application Service Provider's site.

- b. Is the use of the data both relevant and necessary for the purpose for which the system is designed?

Yes.

- c. Will the system derive (i.e., create) new data or create previously unavailable data about an individual through aggregation from the information collected?

No

- (1) How will aggregated data be maintained, filed, and utilized?

(2) How will aggregated data be validated for relevance and accuracy?

4. If data are consolidated, what *controls* protect it from unauthorized access, use, or modification?

N/A

5. How will the data be *retrieved* from the system?

- a. Can it be retrieved by personal identifier? Yes X No \_\_\_\_  
If yes, explain.

Training records can be retrieved by name.

- b. Is a password or data description required? Yes X No \_\_\_\_  
If yes, explain.

In addition to a Login ID and Password, the LMS has a security level access to protect from unauthorized access/use.

6. Describe the report or reports that can be produced from this system.

- a. What reports are produced from the system?

No reports are produced from the system, however, queries can be performed by name, organization, time frame, etc.

- b. What are the reports used for?

No reports, however, results of queries will be used by NRC employees to retrieve their training records and by organizations to review their direct reports training records to ensure organization training goals are met and to ensure qualification program goals are being met.

- c. Who has access to these reports?

No reports, however, queries can be performed by NRC employees and their supervisors/management.

7. *Records retention*

- a. What are the record types contained in this system and the medium on which they reside? (Examples: type - program records, medium - electronic; type - database, medium - electronic; type - system documentation, medium - paper.)

Employee training records, medium - electronic; type - database  
Course & Session records, medium - electronic; type - database

- b. What is the NARA-authorized retention period for each records series in this system?

5 years

- c. If unscheduled, what are your retention requirements for each records series in this system?

N/A

- d. What are the procedures for disposing of the data at the end of the retention period (specifically address paper copy, magnetic, or other forms of media)?

Paper copy with non-privacy act information will be disposed through the normal trash process. Electronic records will be deleted from the system at the end of the retention period. Paper copy with privacy act information will be disposed in NRC approved Classified/Sensitive Unclassified receptacles.

- e. How long will produced reports be maintained?

No reports produced.

- f. Where are the reports stored?

N/A

- g. Where are the procedures for maintaining the data/reports documented?

N/A

- h. How will unused or unwanted reports be disposed of?

N/A

8. Capability to *monitor individuals*

- a. Will this system provide the capability to identify, locate, and monitor (e.g., track, surveillance) individuals? Yes\_\_\_\_ No X\_\_\_\_.  
If yes, explain.

- b. What controls will be used to prevent unauthorized monitoring?

N/A

9. Coverage Under Existing *Privacy Act System of Records*

- a. Under which Privacy Act System of Records (SOR) notice does this system operate (link to list of SOR available on NRC Internal Home Page)? Provide number and name.

NRC-19, Official Personnel Training Record Files.

- b. If the Privacy Act System of Records is being modified, will the SOR notice require amendment or revision? Yes \_\_\_\_ No X  
If yes, explain.

10. Access to the Data

- a. Who will have access to the data in the system (users, managers, system administrators, developers, other)?

Employees  
Supervisors  
System Administrators

- b. Are criteria, procedures, controls, and responsibilities regarding access documented? If so, where?

Yes. System Requirements Specification documentation

- c. Will users have access to all data in the system or will users' access be restricted? Explain.

User access is restricted. Security level access is controlled by the LMS.

- d. What controls are or will be in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access?

Logon id and password and security level access is controlled by LMS to ensure proper access is maintained.

- e. Do other systems share data or have access to data in this system?  
Yes X No \_\_\_\_ If yes, explain.

The Daily Staff Profile file is transmitted from NRC to the Application Service Provider to update staffing information in training records. OPM's EHRI program will access training records.

- f. Will other agencies share data or have access to data in this system (Federal, State, local, other)? Yes X No \_\_\_\_ If yes, explain.

OPM, through the EHRI program, will access training records.

- g. Were Privacy Act clauses cited (or will be cited) and were other regulatory measures addressed in contracts with contractors having access to this system?  
Yes  X  No \_\_\_\_\_. If yes, explain.

This is included in the Interagency Agreement with OPM and the contract between OPM and the contractor. The clauses are 52.224-1, Privacy Act Notification and 52.224-2, Privacy Act.

## DEFINITIONS

Personal Information is information about an identifiable individual that may include but not be limited to:

- race, national or ethnic origin, religion, age, marital or family status
- education, medical, psychiatric, psychological, criminal, financial, or employment history
- any identification number, symbol, or other particular assigned to an individual
- name, address, telephone number, fingerprints, blood type, or DNA

Aggregation of data is the taking of various data elements and then turning them into a composite of all the data to form another type of data such as tables or data arrays, or collecting data into a single database.

Consolidation means combining data from more than one source into one system, application, or process. Existing controls for the individual parts should remain or be strengthened to ensure no inappropriate access by unauthorized individuals. However, since individual pieces of data lose their identity, existing controls may actually be diminished; e.g., a summary census report may not point at the individual respondent but rather at a class of respondents, which makes it less personal.



**PRIVACY IMPACT ASSESSMENT REVIEW/APPROVAL**  
(For Use by OIS Staff)

System Name: **Learning Management System (LMS)**

Submitting Office: **OIS for Office of Human Resources**

**A. PRIVACY ACT APPLICABILITY REVIEW**

☐ Privacy Act is not applicable.

☒ Privacy Act is applicable. Currently covered under System of Records, NRC-19, "Official Personnel Training Records." No modification to the system notice is required.

☐ Privacy Act is applicable. Creates a new system of records. FOIA/PA Team will take the lead to prepare the system notice.

☐ Privacy Act is applicable. Currently covered under System of Records, NRC- . Modification to the system notice is required. FOIA/PA Team will take the lead to prepare the following changes:

**Comments:**

The LMS is replacing the current PeopleSoft HRMS training module, supporting the e-Gov and e-Training initiatives. Information will be retrieved by an individual's name after authorized login and password. Level of access is dependent on "need-to-know." This new system will be covered under Privacy Act system of records NRC-19.

Reviewer's Name	Title	Date
Sandra S. Northern	Privacy Program Officer	May 12, 2006

**B. INFORMATION COLLECTION APPLICABILITY DETERMINATION**

☐ No OMB clearance is needed.

☐ OMB clearance is needed.

☒ Currently has OMB Clearance.

**Comments:**

Information collected by the Learning Management System (LMS) public respondents, such as Agreement States, is used to identify participants in NRC training courses. This collection of

information is covered under OMB Clearance Number 3150-0183. Around October 1 each year, the Office of State and Tribal Programs (STP) sends a memo to all Agreement States notifying them of upcoming NRC training courses. Agreement States wishing to participate in these courses fill out a training application and submit the application to STP. STP gathers information regarding course attendees and forwards it to the NRC training coordinator, who enters the information into the LMS. Agreement State information consists of student name and Agreement State abbreviation, and is entered into the LMS by the NRC training Coordinator.

Reviewer's Name	Title	Date
Christopher J. Colburn	Team Leader	May 24, 2006

### C. RECORDS RETENTION AND DISPOSAL SCHEDULE DETERMINATION

☐ Additional information is needed to complete assessment.

☐ Needs to be scheduled.

☒ Existing records retention and disposition schedule covers the system - no modifications needed.

☐ Records retention and disposition schedule must be modified to reflect the following:

#### Comments:

System is covered by GRS 1-29, "Training Records" and GRS 20-3, "Electronic Versions of Records Scheduled for Disposal." GRS 20-3 allows the paper schedule (GRS 1-29) to be applied to these records being maintained in electronic format.

Reviewer's Name	Title	Date
Jeff Bartlett	Senior Records Management Analyst	5/16/06

#### D. BRANCH CHIEF REVIEW AND CONCURRENCE

\_\_\_\_\_ Does not constitute a Privacy Impact Assessment required by the E-Government Act of 2002

X Does constitute a Privacy Impact Assessment required by the E-Government Act of 2002 and requires approval of the Director, IRSD.

CONCUR IN REVIEW:           /RA/           Date: 05/25/2006

Brenda J. Shelton, Chief  
Records and FOIA/Privacy Services Branch

**E. DIVISION DIRECTOR APPROVAL OF PRIVACY IMPACT ASSESSMENT:**

(Approval is only required when Yes is given to Section B, questions 1 and 2 and Section C, question 1. The system collects, maintains, or disseminates personal information in identifiable form about members of the public.)

/RA by Brenda J. Shelton Acting for/ Date: 05/25/2006  
John J. Linehan, Director, Information and Records Services Division

**TRANSMITTAL OF PRIVACY IMPACT ASSESSMENT/  
PRIVACY IMPACT ASSESSMENT REVIEW RESULTS**

TO: (Sponsoring Office) <b>Office of Human Resources</b>	Office Sponsor: <b>James McDermott, Office Director</b>	
Reginald W. Mitchell, Director Business Process Improvement and Applications Division, OIS	Name of System: <b>Learning Management System (LMS)</b>	
Kathy L. Lyons-Burke, CISSP Senior IT Security Officer (SITSO)/Chief Information Security Officer (CISO) Office of Information Services	Date Received: <b>04/28/2006</b>	Date Completed: <b>05/24/2006</b>
<p><b>Noted Application Development and System Security Issues:</b></p> <p>This system will maintain Privacy Act protected records.</p> <p>GRS schedules apply to this system.</p> <p>Information collected by LMS non-government respondents is covered under OMB Clearance Number 3150-0029.</p>		
Brenda J. Shelton, Chief Records and FOIA/Privacy Services Branch, OIS	Signature: <b>/RA/</b>	Date: 05/25/2006