

Attachment 5: CTRP Privacy Act Memo



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

National Institutes of Health
Bethesda, Maryland 20892

DATE: October 16, 2009
TO: John Speakman
CBIT, OD, NCI
FROM: NIH Privacy Act Officer
SUBJECT: Non-applicability of the Privacy Act

I have reviewed your submission to OMB requesting approval for the "Clinical Trials Reporting Program (CTRP) Database (NCI)".

Although personally identifiable information (e.g., patient birth date and zip code) will be collected, the database was not designed to retrieve information about an individual. The "study subject ID" refers to a code assigned by an individual trial site where a research subject or patient is accrued on a study. The code cannot be derived from any information related to the individual nor will it be associated with any key provided to NCI. Therefore, NCI will not receive any information from individuals submitting information to the database which it could use with the personally identifiable information to re-identify research subjects or patients.

Since personal identifiers are not collected and used to retrieve information about individuals, the Privacy Act does not apply.

If you have any questions, please contact my office at (301) 496-2832.

A handwritten signature in black ink, appearing to read "Karen M. Plá".

Karen M. Plá